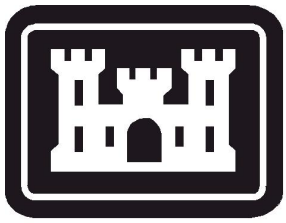

US Army Corps
of Engineers®
New Orleans District

SCOPING REPORT

Louisiana Coastal Area

Louisiana — Comprehensive Coastwide Ecosystem Restoration Feasibility Study

Public Scoping Meeting and Scoping Letters
Comments and Concerns

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INTRODUCTION

The National Environmental Policy Act (NEPA) of 1969 established a nationwide policy to include in every recommendation or report on proposals for major Federal actions significantly affecting the environment a detailed statement of the environmental impact of the proposed action. A Notice of Intent to Prepare a Draft Programmatic, Supplemental Environmental Impact Statement (PSEIS) for the Louisiana Coastal Area, Louisiana — Comprehensive Coastwide Ecosystem Restoration Feasibility Study (hereinafter LCA Comprehensive Study) was published in the *Federal Register* (Volume 67, No. 65) on Thursday, April 4, 2002. The NEPA also provides for an early and open public process—scoping—for determining the scope of issues, resources, impacts, and alternatives to be addressed in the draft PSEIS.

The New Orleans District of the U.S. Army Corps of Engineers (Corps) and its local sponsor, the Louisiana Department of Natural Resources, along with six Federal and three state agencies are working together as a collocated team on this study. The agencies involved include the Louisiana Governor's Office, the Louisiana Department of Wildlife and Fisheries, the Environmental Protection Agency, the Natural Resources Conservation Service, NOAA Fisheries (National Marine Fisheries Service), the U.S. Fish & Wildlife Service, and the U. S. Geological Service. The study team is based at the New Orleans District office of the Corps.

Scoping Process

The scoping process is designed to provide an early and open means of determining the

scope of issues (problems, needs, and opportunities) to be identified and addressed in the draft PSEIS. Scoping is the process used to: a) identify the affected public and agency concerns; b) facilitate an efficient PSEIS preparation process; c) define the issues and alternatives that will be examined in detail in the PSEIS; and d) save time in the overall process by helping to ensure that the draft statements adequately address relevant issues. Scoping is a process, not an event or a meeting; it continues throughout the PSEIS process and may involve meetings, telephone conversations, and/or written comments. Scoping is a critical component of the overall public involvement program. An intensive public involvement program will be initiated and maintained throughout the study to solicit input from affected Federal, State, and local agencies, Indian tribes, and interested private organizations and individuals. This Scoping Report presents and summarizes the scoping comments expressed at the public scoping meetings, as well as written comments, scoping comment letters, and email comments received during the comment period ending May 9, 2002. A series of public scoping meetings regarding the LCA Comprehensive Study were held at 7:00 PM on the following dates and at the designated locations:

April 15, 2002: at the LSU Agriculture Center Extension Office, 1105 West Port Street, Abbeville, Louisiana 70510.

April 16, 2002: at McNeese State University, Hardtner Hall, Stokes Auditorium, 550 Sale Road, Lake Charles, Louisiana 70609.

April 17, 2002: at the Belle Chasse Auditorium, 8398 Highway 23, Belle Chasse, Louisiana 70037.

April 18, 2002: at Southeastern Louisiana University, Room 133, University Center, 700 West University Avenue, Hammond, Louisiana 70402.

April 22, 2002: at Peltier Park, 151 Peltier Park Drive, Thibodeaux, Louisiana, 70301.

April 24, 2002: at the Morgan City Municipal Auditorium, 928 Myrtle Street, Morgan City, Louisiana 70380.

Study Authority

The LCA Comprehensive Study is authorized through Resolutions of the U.S. House of Representatives and Senate Committees on Public Works, October 19, 1967 and April 19, 1967.

Proposed Action

Building on the Coast 2050 Plan and the May 1999, 905(b) Reconnaissance Report, the New Orleans District of the U.S. Army Corps of Engineers (Corps) proposes to prepare a PSEIS for the LCA Comprehensive Study. The proposed action would assess, at a feasibility programmatic-level, coastal restoration projects that would sustain a coastal ecosystem that supports and protects the environment, economy and culture of Southern Louisiana and that contributes greatly to the economy and well being of the nation. The LCA Comprehensive Study will supplement previous NEPA documents, combining the “lessons learned” from previous Louisiana coastal wetlands restoration efforts, and develop the existing Coast 2050 restoration strategies into projects for the creation of a programmatic, coast-wide, ecosystem restoration plan.

In December 1998 the Louisiana Coastal Wetlands Conservation and Restoration Task Force and the Louisiana State Wetlands Conservation and Restoration Authority (constituted under Act 6 R.S. 49:213 *et seq*.) prepared and adopted the Coast 2050 Plan as their official restoration plan. The December 1998 report "Coast 2050: Toward a Sustainable Coastal Louisiana", also known as the "Coast 2050 Plan", was developed in recognition of the need for a single comprehensive plan for restoration and sustainability of the Louisiana coastal area. The Coast 2050 Plan, which has been supported by the state of Louisiana, five Federal agencies, and the local coastal parish governments of Louisiana, serves as the joint coastal restoration plan of the Coastal Wetlands Planning, Protection, and Restoration Act (CWPPRA; Public Law No. 101-646 (1990)) and the Louisiana State Wetlands Conservation and Restoration Authority.

The LCA Comprehensive Study will assess, at a programmatic feasibility-level, the Coast 2050 Plan. Specifically, the LCA Comprehensive Study will evaluate the restoration strategies identified in the Coast 2050 Plan for each of the four major hydrologic regions of the state (consisting of nine hydrological basins) of the coastal zone, developing those regional strategies that are considered keystone strategies into projects, and combining those projects into plans that best address the ecosystem restoration needs for the entire Louisiana coastal area, while complying with applicable rules, regulations and administration policy.

The purpose of the LCA Comprehensive Study is to determine the feasibility of sustaining a coastal ecosystem that supports and protects the environment, economy and culture of southern Louisiana, and that contributes greatly to the economy and well being of the nation. Specifically, the LCA Comprehensive Study will determine the feasibility of achieving the following restoration goals:

1. Sustaining a coastal ecosystem with the essential functions and values of the natural ecosystem;
2. Restoring the ecosystem to the highest practicable acreage of productive and diverse wetlands; and
3. Accomplishing this restoration through an integrated program that has multiple use benefits, benefits not solely for wetlands, but for all the communities, industries, and resources of the coast.
4. Developing a comprehensive plan that is coordinated and consistent with other major land use and infrastructure features, particularly with respect to navigation, hurricane protection/flood control, and oil and gas production.

The LCA Comprehensive Study, in addition to conducting a programmatic environmental impact assessment, will supplement the findings from the following NEPA documents:

1. The draft EIS "Land Loss and Marsh Creation, St. Bernard, Plaquemines and Jefferson Parishes, Louisiana" (USACE 1990);
2. The EIS titled "Coastal Wetlands Planning, Protection and Restoration Act Louisiana Coastal Wetlands Restoration Plan" (La Coastal Wetlands Conservation and Restoration Task Force, 1993); and
3. The "Programmatic Hydrologic Management Environmental Impact Statement and

Appendices" (USACE 1996).

Additionally, the LCA Comprehensive Study will utilize and complement the findings from the following reports and studies:

1. The "Mississippi and Louisiana Estuarine Areas Reconnaissance Report" (USACE 1981);
2. The "Louisiana Coastal Area, Louisiana, Shore and Barrier Island Erosion" Initial Evaluation Study (USACE 1984);
3. MRC/MVD Task Group Report (USACE 1985);
4. Louisiana Coastal Area- Mississippi River Delta Study Recon (USACE 1990);
5. Louisiana Coastal Area – Ecosystem Restoration, Louisiana reconnaissance report approved May 1999; and
6. Mississippi River Sediment, Nutrient, and Freshwater Redistribution (MRSNFR) Study (USACE 2000).

Need for the Study

The 905(b) Reconnaissance Report recommended that the Coast 2050 plan proceed to the feasibility phase, contingent upon the execution of a Feasibility Cost Sharing Agreement (FCSA) with a non-Federal Sponsor. An FCSA was executed with the Louisiana Department of Natural Resources on February 17, 2000 and amended on March 14, 2002.

The 905(b) Reconnaissance Report estimates that more than a million acres of Louisiana coastal wetlands have been lost within the last 60 years and the current land loss rate ranges between 25 and 30 square miles annually (16,000 to 19,000 acres), or about one football field every 25 minutes. This accounts for nearly 80 percent of all coastal land loss in the lower 48 states today. The 905(b) Reconnaissance Report concludes that even with current restoration efforts, Louisiana is projected to lose nearly 400,000 acres of marsh and 232,000 acres of swamp by the year 2050, an area the size of Rhode Island.

In February 2002, the Governor's Committee on the Future of Coastal Louisiana (COFCL) prepared a report, "Saving Coastal Louisiana: Recommendations for Implementing an Expanded Coastal Restoration Program," which provided recommendations as a starting point for a renewed and expanded coastal restoration effort. The COFCL report characterizes Louisiana's land loss crisis as an emergency of untold cost to the state of Louisiana and the nation that must be confronted now, with all available resources. The devastation of the coastal land loss will, according to the COFCL report, directly affect our nation's security, navigation, energy consumption, and food supply. The COFCL report further elaborates that the potential loss of lives, infrastructure, industry, ecosystems and culture cannot be overstated.

Study Alternatives

During the Coast 2050 public meetings conducted in 1997-1998, 83 regional ecosystem restoration strategies were developed. In January 2001, these strategies were revised into 88 regional ecosystem restoration strategies. The LCA Comprehensive Study will develop the Coast 2050 Plan strategies that are considered keystone strategies into an array of alternatives

that consist of projects. Other restoration alternatives that will be considered include the No Action Alternative, as well as restoration strategies/alternatives suggested during the scoping process. Alternatives will be evaluated to ensure compliance with current Federal and state laws and regulations. Potential adverse effects of strategies will be identified and recommendations for mitigation measures, if appropriate, will be suggested. A programmatic, supplemental EIS is being prepared because of the potential for significant direct, indirect, secondary, and cumulative impacts on the human and natural environment. The LCA Comprehensive Study is envisioned as the next step in the natural progression and evolution in our efforts to address the problems and determine opportunities for the adaptive environmental assessment and restoration of the coastal wetlands of Louisiana.

Resources/Issues to be addressed in the PSEIS

This Scoping Report presents the scoping comments regarding significant resources and issues to be evaluated in the PSEIS. They include elements of the natural environment, such as wetlands, fish and wildlife, natural waterways, and waterbodies; elements of the man-made environment such as water quality, drainage patterns, floodplains, regulated hazardous wastes, socioeconomic resources, and transportation; as well as historic and cultural resources.

Study Area

The LCA Comprehensive Study will evaluate the restoration strategies identified in the Coast 2050 Plan for each of the nine major hydrologic basins of the Louisiana coastal zone, developing those strategies, and selecting plans that best address the ecosystem restoration needs for the entire Louisiana coastal area, while complying with applicable rules, regulations and administration policy. Figure 1 displays the general study area for the Louisiana Coastal Area authority. Figure 2 displays the four Coast 2050 regions and the nine major coastal basins. The study area spans 20 coastal parishes.

Figure 1. Louisiana Coastal Area (LCA) Authorized Study Area

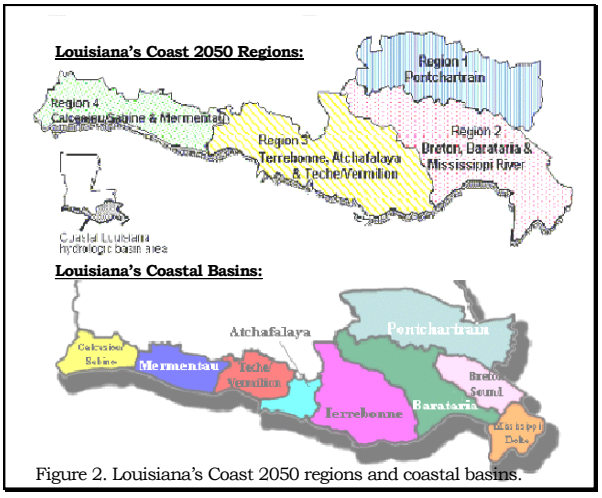

Figure 2. Louisiana's Coast 2050 regions and coastal basins.

Scoping Questions

The Public Notice provided two questions as a means of focusing the public's comments and concerns on identifying "*KEYSTONE STRATEGIES*":

Question #1. What are the most important issues, resources, and impacts that we should consider in the PSEIS and the study process?

Question #2. Are there any other Coast 2050 coastwide or regional strategies or modifications to existing Coast 2050 coastwide or regional strategies that we should consider in the PSEIS and the study process?

At each scoping meeting, the Study Team presented a brief description of the NEPA scoping process, the Corps study process, and how the NEPA process will be implemented, including, preparation of the PSEIS. The number of scoping participants included: 25 at Abbeville, 28 at Lake Charles, 44 at Belle Chasse, 17 at Hammond, 12 at Thibodaux, and 22 at Morgan City (see attached list of names of scoping participants).

The scoping facilitator asked each scoping participant to provide his or her comments. Comments were recorded and this procedure was repeated until no new comments were expressed. At the Belle Chasse scoping meeting, participants were separated into four different groups, comprised of about 15 individuals each, to provide their comments. At all other scoping meetings, participants were not separated into smaller groups.

REVIEW OF SCOPING COMMENTS

The scoping comments document the public's concerns about the scope of the LCA Comprehensive Study and also identify strategies suggested as "keystone" to restoration efforts. This information will be considered both in the study process and in preparation of the draft PSEIS. A total of 301 comments were received during the comment period; 287 comments were expressed at the six scoping meetings (see Tables 1a-f) and 14 written (letter, fax, and email) and verbal (telephone) comments were received during the comment period. All registered scoping meeting participants, as well as those providing written or verbal comments, will be included on the study mailing list of interested parties and will receive copies of this Scoping Report. The study mailing list will also be used for informing interested parties of the availability of the draft PSEIS for their review and comment. In addition, the Scoping Report will be posted on the study web site located at http://www.coast2050.gov .

Tables 1a-g display where in the draft PSEIS individual scoping comments would likely be addressed. To create Tables 1a-g, each scoping comment was reviewed for content and categorized by PSEIS subject matter heading. A scoping comment may be addressed in more than one section of the draft PSEIS if such is necessary to fully consider the ramifications of the comment. The PSEIS subject matter headings include: Purpose and Need for Action (PN), Alternatives Including the Proposed Action (Alt), Affected Environment (AE), and Environmental Consequences (EC). Scoping comments also included specific concerns

regarding Consultation and Coordination (CC) with the public and other agencies. Compliance with Regulations (Federal, state, and local environmental laws and regulations) is included in this category. Compliance with major environmental laws and regulations such as the Endangered Species Act of 1973, the Coastal Zone Management Act of 1972, and the Fish and Wildlife Coordination Act will be addressed in specific sections of the draft PSEIS (especially in the Environmental Consequences section).

SUMMARY OF SCOPING COMMENTS

The 287 comments expressed at the six public scoping meetings and the 14 written or verbal comments are summarized below. Scoping comments are grouped by PSEIS subject matter heading. A brief description of those comments most often expressed is described. Generally, the most numerous comments and concerns were expressed regarding project alternatives, followed by environmental consequences, consultation and coordination, affected environment, and purpose and need for action.

PURPOSE AND NEED FOR THE ACTION. This section of the draft PSEIS identifies the proposed action, the need for the proposed action, the study authority, major public concerns, and planning objectives. Of the 301 total scoping comments, 87 comments relate to the purpose and need for the proposed action. Typical comments related to the purpose and needs included: protection of infrastructure, revamping the state and Federal laws that hinder restoration efforts, and suggestions regarding the need to restore specific areas, such as the Barataria-Terrebonne estuary system, barrier islands, and land bridges.

The Abbeville scoping meeting participants expressed 10 comments related to purpose and need. Comments regarding consideration of artificial reef formation, restoration to address interior marsh loss, and the management of upland watershed hydrology were most often expressed.

The Lake Charles scoping meeting participants expressed nine comments related to purpose and need. Comments regarding the preservation of the ecosystem and prevention of saltwater intrusion were most often expressed. Other comments expressed more than once included: construction of a battle line along the coastal area and watershed management to reduce rapid inflows.

The Belle Chasse scoping meeting participants expressed 14 comments related to purpose and need. Comments regarding the ability of the EIS to reflect community needs and identification of project benefits with respect to urban areas were most often expressed. Other comments expressed more than once include: close the Mississippi River-Gulf Outlet; the beneficial use of material resulting from hopper dredging; coordinate Clean Water Act Section 404 permits and restoration efforts; and protection of oysters from effects of freshwater diversions.

The Hammond scoping meeting participants expressed eight comments related to purpose and need. Comments most often expressed include: the opportunistic use of the Bonne Carre Spillway; anticipation of potential problems to restoration (such as oyster lease issues); a

continuation of public meetings to keep the public informed; and coordination of the LCA Comprehensive Study efforts with other restoration efforts.

The Thibodaux scoping meeting participants expressed 16 comments related to purpose and need. Comments most often expressed included: consider constructing the 3rd Delta Conveyance Channel; the need for accelerated construction of restoration measures; implement large-scale restoration projects; integrate the LCA Comprehensive Study with other restoration studies; increase public involvement and public education; restoration and protection of barrier islands; concern with an appropriate strategy for the sequence of implementing restoration strategies; and the alleged inadequacy of existing restoration projects.

The Morgan City scoping meeting participants expressed 17 comments concerning purpose and need. Comments most often expressed include: the use of the Atchafalaya River and the Houma Navigation Channel as a source and means of transport of freshwater into the basin. Other comments expressed more than once included: consider expanding the study area to include the entire Atchafalaya Basin Floodway; highlight the urgency of need to restore wetlands in Terrebonne Parish; consideration of upstream influences and nutrients entering the region; consider focusing restoration efforts on those areas with highest land loss rates; addressing the siltation of natural bayous; and coordination of restoration efforts with local landowners.

From the 14 total written comments, 13 relate to the purpose and need for action. Comments directly addressing purpose and need include: consider accelerating the restoration process; the importance of considering regional ecosystem values; the significance and importance of considering fish habitat; consideration of many different problems associated with diverting Mississippi River waters for restoration purposes; flood protection; and returning the natural hydrology of the entire system.

ALTERNATIVES INCLUDING THE PROPOSED ALTERNATIVE. This section of the draft PSEIS identifies and describes plans eliminated from further study, the no-action or without-project conditions, alternatives considered in detail, the preferred alternative, and the comparative impacts of alternatives. Consideration of the "No Action" alternative is required, and includes a description of the consequences of no action being taken. Of the 301 total scoping comments, 207 comments regarding project alternatives and strategies were expressed. Reestablishment of wooded barrier islands and barrier headlands was an alternative mentioned repeatedly at each scoping meeting. In addition, the use of the 3rd Delta Conveyance Channels Alternative to divert fresh water was mentioned repeatedly and was considered an alternative applicable to several different basins. One strategy common throughout the Lake Charles, Thibodaux, and Belle Chasse areas is the process of dredging and use of sediment.

The Abbeville scoping meeting participants expressed 30 comments regarding alternatives. Those comments most often expressed include: consider shoreline protection and reef restoration; widespread concern with multiple hydrological issues related to restoration activities; the restoration and preservation of Marsh Island; determining alternatives that address the problem of marsh loss due to an influx of freshwater from inland sources; determining alternatives that address the adverse effects on agriculture caused by saltwater intrusion. Other comments expressed more than once included: devise alternatives that would provide for the

restoration of natural ridge habitat; and design alternatives that would reduce sedimentation in bay areas.

The Lake Charles scoping meeting participants expressed 23 comments regarding alternatives. Those comments most often expressed include: extend protection at Holly Beach; control salinity to prevent saltwater intrusion into interior wetlands; develop alternative strategies for the protection of existing coastal resources, and consider expanding the study area to include the upper Sabine and Calcasieu basins outside of the coastal zone. Other comments expressed more than once included: devise alternatives that operate and manage all existing locks to move water and operation of the Calcasieu Lock to evacuate excess water.

The Belle Chasse scoping meeting participants expressed 62 comments regarding alternatives. Those comments most often expressed include: consider construction of multiple diversions for restoration; restoration of barrier islands; and finding a way to utilize the sediments from the Mississippi River for restoration. Other comments expressed more than once included: the construction of artificial reefs; the need for freshwater diversion with input limited to those marshes located adjacent to rivers; closing canals entering navigation channels to reduce wake erosion; and controlling salinity to reduce saltwater intrusion.

The Hammond scoping meeting participants expressed 36 comments regarding alternatives. Comments most often expressed included: the opportunistic use of the Bonne Carre; avoiding marsh management structures; the use of existing waterways and outlets for freshwater diversion; consideration of all methodologies for restoration; prevention of shoreline erosion in Lake Pontchartrain; and the use of the Industrial Canal lock replacement as a possible diversion opportunity.

The Thibodaux scoping participants expressed 26 comments regarding alternatives. The creation the 3rd Delta Conveyance Channel for ecosystem restoration was considered the most important alternative by many of the scoping participants and was repeatedly presented. Other comments expressed more than once included: sediment use for the control of saltwater intrusion; addressing flood and fishery issues; hydrologic control of navigation channels; and stabilization of critical shoreline areas.

The Morgan City scoping participants expressed 17 comments regarding alternatives. One of the most often expressed alternatives was that restoration efforts should include a greater focus on Terrebonne Parish and other areas with high land loss rates. Creation of the 3rd Delta Conveyance Channel for ecosystem restoration was also considered one of the most important alternative by many of the scoping participants and was repeatedly presented. Other comments expressed more than once included: the use of water and sediments from the Atchafalaya River for restoration of surrounding parishes; restore barrier islands; restore land bridges; and consider restoration with a slurry of sediments by pipeline.

Thirteen written comments were submitted relating to alternatives. These include: consider implementing multiple diversions into the basins; consider the frequent use of the Bonne Carre Spillway; the use of alternative material for fill and shoreline protection; the use of tires and wooden pilings for shoreline protection; strategic pipeline diversions and barrier island

restoration to deter saltwater intrusion; maximizing estuarine organism access; provide protection for Lake Pontchartrain shoreline; coordination between the 404 permitting process and those areas restored.

AFFECTED ENVIRONMENT. This section of the draft PSEIS identifies and describes the natural and human resources including physical, biological, social and economic, and cultural resources likely to be impacted in and surrounding the vicinity of the proposed action area and alternative areas. This section also includes a description of the locations, quantities, and qualities of significant resources and why they are significant.

Of the 301 total comments expressed at the scoping meeting, 113 comments related to the affected environment. In general, the most often presented scoping comment related to the need to do something for the widespread coastal land loss and saltwater intrusion across the Louisiana coastal zone. Other comments common across all scoping meetings include: the problem of saltwater intrusion adversely impacting existing fresh, intermediate, and brackish marshes; and the deterioration and loss of inland marshes. Another comment regarding the affected environment common across all scoping meetings was the loss of barrier islands and headlands.

The Abbeville scoping meeting participants expressed seven comments concerning the affected environment. The most often mentioned comments included: extend protection at Holly Beach; concern with flooding (too much water) in the surrounding areas; concern with reef restoration in the Gulf of Mexico; restoration of Marsh Island; restoration of the shoreline; and concern with restoration of Vermilion Bay to a brackish hydrology.

The Lake Charles scoping meeting participants expressed 15 comments regarding the affected environment. The most often mentioned comments include: concern with the salinity intrusion into the Sabine River and adjacent wetlands and Sabine Lake; operation of the Calcasieu Lock to evacuate excess water from Calcasieu Lake; and attention to the diversity of local (native) plants.

The Belle Chasse scoping participants expressed 39 comments relating to the affected environment. The most often presented comments include: concern that the amount of sediment produced by freshwater diversion is sufficient to rebuild/restore the target area; concern with water quality issues; protection of oysters from restoration-related impacts; and consideration of adverse impacts of restoration activities on plants, wildlife and fish; consideration of potential impacts of nuisance species on restoration; and restore barrier islands.

The Hammond scoping meeting participants expressed 23 comments related to the affected environment. The most often presented comments included: consideration of urban sprawl; hurricane impacts; use of the Bonne Carre Spillway as a tool for restoration; and sewage treatment on the north shore of Lake Pontchartrain.

The Thibodaux scoping meeting participants expressed seven comments relating to the affected environment. The most often presented comments include: consider using Mississippi River freshwater and sediment for restoration purposes; consider flood protection as an aspect of restoration projects; and consider the 3rd Delta Conveyance Channel to address saltwater

intrusion and land loss.

The Morgan City scoping meeting participants expressed 10 comments on the affected environment. The most often presented comments include: consider restoring Terrebonne Parish next; the use of waterways such as the Atchafalaya River and the 3rd Delta Conveyance Channel for restoration; and the restoration of natural ridges and levees.

From the 14 total written comments, 11 comments relate to the affected environment. The most often presented comments include: the loss of renewable resources in the coastal zone; the impact of tidal exchange control on the fish habitat; consider testing dredged material for toxins; consider dredging the Empire Waterway; and studying the effects of restoration projects on threatened and endangered species.

ENVIRONMENTAL CONSEQUENCES. In this section of the draft PSEIS, the environmental effects of each alternative on significant resources are described and compared among alternatives. For each alternative considered in detail, the direct, secondary, and cumulative impacts to each significant resource would be compared. Potential mitigation measures for adverse environmental impacts are also expressed. For each alternative considered in detail, current and predicted future conditions would be used as the basis for determining mitigation (preferably in-kind and in-basin), insuring compliance with all rules, regulations, and guidelines.

Of the 301 total comments and concerns expressed at the scoping meeting, 116 comments related to the environmental consequences. One concern common to all areas is the restoration of barrier islands and headlands because these areas protect inland areas and serve as habitats for neotropical, migrating birds. Another shared concern is the effect of freshwater diversion on oyster populations. For example, at the Belle Chasse scoping meeting, one comment considered the maintenance of target salinities in order to sustain oysters and marine fisheries.

The Abbeville scoping meeting participants expressed four comments related to environmental consequences. These comments included: consider marsh loss due to the influx of freshwater north and south of Louisiana Highway 82; general concern with coastal land loss; general concern with addressing marsh loss; and concern with restoring woody habitat for migrating neotropical birds.

The Lake Charles scoping meeting participants expressed 11 comments related to environmental consequences. The most often expressed comments included: the need for salinity controls to prevent saltwater intrusion; need for barrier island/shoreline restoration; restrict recreational vehicles from beach and dune areas; impacts of hydrologic modification and maintenance of navigation channels; and the need to put a higher priority on protecting the Holly Beach area.

The Belle Chasse scoping meeting participants expressed 50 comments related to environmental consequences. The most often presented comments include: concern that the amount of sediment produced by freshwater diversion is sufficient to rebuild/restore the target area; concern with water quality issues; protection of oysters from restoration-related impacts;

and consideration of adverse impacts of restoration activities on plants, wildlife and fish; consideration of potential impacts of nuisance species on restoration; and restore barrier islands.

The Hammond scoping meeting participants expressed 25 comments related to environmental consequences. The most often presented comments included: consideration of urban sprawl; hurricane impacts; use of the Bonne Carre Spillway as a tool for restoration; and sewage treatment on the north shore of Lake Pontchartrain.

The Thibodaux scoping meeting participants expressed seven comments related to environmental consequences. The most often expressed comments included: consider the importance of salinity control to prevent saltwater intrusion; consider flood protection as part of the restoration measures; consider using Mississippi River sediment-laden waters for restoration; and coordination between the 404 permitting process and those areas restored.

The Morgan City scoping meeting participants expressed 9 comments related to environmental consequences. The most often expressed comments include: consider impacts to pipeline exposure due to erosion; the use of riverine resources to conserve water; and stabilization of banks along any of the navigation channels.

From the 14 total written comments, 10 comments related to environmental consequences. The most often expressed comments included: the ability to restore the natural hydrology; land loss impacts on the ten national wildlife refuges in coastal Louisiana; consider shoreline protection of Lake Pontchartrain; consider the opportunistic use of the Bonne Carre Spillway; and consider potential impacts to threatened and endangered species.

CONSULTATION AND COORDINATION. This section of the draft PSEIS deals with consultation and coordination with the public and Federal, state, and local agencies, including compliance with various laws and regulations. References to compliance with specific regulations are presented in various sections and appendices throughout the draft PSEIS. A notice will be placed in the *Federal Register* that identifies the draft PSEIS, the agency, and the manner in which copies may be obtained. A date is given for the receipt of comments on the draft, usually 45 days after issuance of the draft PSEIS. The draft PSEIS will contain a table describing the status of compliance with applicable Federal, state, and other laws and regulations. Separate sections are presented in the draft PSEIS describing compliance with the Clean Air Act Applicability Determination, the Coastal Zone Management Act, the Endangered Species Act, the Fish and Wildlife Coordination Act, Prime and Unique Farmlands, 1980 CEQ Memorandum, Section 404(b)(1) evaluation, and coordination the State Historic Preservation Officer. Other scoping comments and concerns, less easily categorized, will be appropriately described and addressed in the draft PSEIS.

Of the 301 total comments concerns expressed at the scoping meeting, 113 comments related to coordination and consultation. Typical comments relating to consultation and coordination included the importance of simplistic public notification procedures explaining projects and involvement of public special interest organizations and public figures.

The Abbeville scoping meeting participants expressed nine comments related to

consultation and coordination. The most often expressed comments included: incorporation of private landowner concerns in the PSEIS; addressing conflicting mission statements between federal agencies; addressing conflicts between restoration strategies; potential conflicts between restoration and permit applications for improvements of navigation channels; and revamping State & Federal laws hindering restoration efforts.

The Lake Charles scoping meeting participants expressed 14 comments related to consultation and coordination. The most often expressed comments included: higher priority for westward extension of Holly Beach breakwaters; consider using taxes to help fund restoration costs; preservation of private land ownership; and adjusting legislation for the Sabine River Compact.

The Belle Chasse scoping meeting participants expressed 32 comments related to consultation and coordination. The most often expressed comments included: holding permittees accountable for erosion control; an emphasis on speeding up the study process; a need for better meeting announcements; public input accepted throughout the study and project process; consistency between Minerals Management Service and the Coast 2050 plan; and the potential impact of the proposed Millennium Port.

The Hammond scoping meeting participants expressed 10 comments related to consultation and coordination of the study. The most often expressed comments included: consider incentives for landowner's cooperation in restoration efforts; continue public meetings; coordinate with other restoration efforts; and consider urban development.

The Thibodaux scoping meeting participants expressed 18 comments related to consultation and coordination. The most often expressed comments included: prioritizing large scale projects such as conveyance channels; the need to reach out to public conservation organizations; expediting the LCA Comprehensive Study to move projects to construction more rapidly; and keeping key people in public organizations involved to spread information to the public.

The Morgan City scoping meeting participants expressed 14 comments related to consultation and coordination. The most often expressed comments included: better information and education for the public; notification of industry stakeholders; seeking nationwide support; water quality and wastewater management; and consider proposed navigation projects and interests.

From the 14 total written comments, 14 related to consultation and coordination. The most often expressed comments included: a holistic approach to environmental restoration; a revision of Louisiana law that states the government acquires ownership of minerals once land submerges; coordination with other restoration projects (i.e. Maurepas Swamp Diversion, Caernarvon Diversion); MMS draft environmental impact statements that do not take the Coast 2050 Plan into consideration; and closing the Mississippi River-Gulf Outlet to deep draft navigation when adequate container facilities exist on the river.

CONCLUSIONS

The scoping comments and concerns described herein identify the significant issues, range of alternatives, and mitigation the public and other interested parties request to be addressed in the Corps study process and in the draft PSEIS. Many of the scoping comments and concerns are presently being considered in the development of alternatives. Scoping comments would likely be addressed in the draft PSEIS as described above. A completion date for the draft PSEIS has not been determined yet. However, when completed, the draft PSEIS will be distributed for public comment and interagency review. The Corps' responses to public comments on the draft PSEIS will be included in the Final PSEIS, which will also be made available to the public for comment.

TABLES 1.a – 1.g
SCOPING MEETING COMMENTS

Table 1a. LCA Comprehensive Study -- Scoping Meeting Comments from Abbeville, Louisiana, April 15, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	PN	ALT	AE	EC	CC	COMMENT (KS=Keystone Strategy)
1			X			Flooding concerns in Vermilion, Iberia, and St. Mary Parishes
2			X	X		Address coastal land loss in the study.
3		X	X			Cheniere Au Tigre shoreline protection and building up coastline.
4	X	X			X	Incorporate Chenier Plain Initiative in PSEIS.
5	X				X	Incorporate private landowner concerns in PSEIS.
6	X	X			X	Assure that all previous Coast 2050 strategies are implemented; especially Region 3 Strategy 15,16,17,18 strategies and Weeks Bay 1135/CWPPRA.[Region 3 Strategy15 (R3-15): Optimize GIWW flows into marshes and minimize direct flow into bays. R3-16. Maintain Vermilion, East and West Cote Blanche bays as brackish. R3-17. Reduce sedimentation in bays. R3-18. Create an artificial reef complex including one extending from Point Chevreuil southward.]
7		X				Restore/preserve Marsh Island.
8			X			Restore reef functions in Gulf to protect Marsh Island.
9		X	X			Restore Vermilion Bay system to brackish hydrology.
10		X		X		No deep water channel through Vermilion Bay.
11					X	Address conflicting mission statements between federal agencies.
12	X	X	X	X		Influx of freshwater north & south of Hwy. 82 in Pecan Island; concerns of marsh loss.
13	X	X				Stop saltwater intrusion so agriculture can survive.
14		X				KS -Restore natural flows. Reconfiguring natural flows changed by man-made structures.
15		X				KS-Allow natural regeneration of existing reefs for flood control.
16		X				KS-Control Wax Lake outlet to reduce freshwater flows onto barrier reefs.
17		X				KS-Region 3 Strategy 18:Create an artificial reef complex including one extending from Point Chevreuil southward.
18		X				KS-Region 3 Strategy 7:Maintain or direct Atchafalaya River water or other freshwater sources and sediment through the GIWW or other water sources.
19		X				KS-Shoreline protection with tires & pilings along entire Region 3 coastline.
20		X				KS-Region 3 Strategy 7 modify to read “or other conveyance channels” in place of “or other channels”. [Region 3-7 Maintain or direct Atchafalaya River water or other freshwater sources.]
21		X				KS-To increase water retention into Region 3 & 4 systems and sediment through the GIWW or other water sources.
22		X				KS-Region 4 Strategy 4:Move water from Lakes Subbasin across Hwy. 82 including outfall management and flood protection where needed.
23		X				KS-Reduce tidal flux/prism into marshes to reduce interior marsh loss so that alligators benefit. Similar to Region 3 Strategy 10: Restore historic hydrologic conditions of major tidal exchange points or prevent adverse tidal exchange points between the Gulf/lake, lake/marsh, bay/marsh, Gulf/bay and marsh/navigation channel locations.
24		X				KS-PSEIS should cover strategies no matter if it’s a federal, state, or private-funded project – streamline permit process.

Table 1a. LCA Comprehensive Study -- Scoping Meeting Comments from Abbeville, Louisiana, April 15, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	PN	ALT	AE	EC	CC	COMMENT (KS=Keystone Strategy)
25	X					Restoration strategies should include infrastructure protection (cities, roads, pipelines, etc.).
26		X				KS-Region 3-Strategy 2 and merge Atchafalaya and Wax Lake Deltas [R3-2: Increase deltaic land building where feasible.
27		X				KS-Tie reef restoration to water management throughout Atchafalaya Basin for resource management.
28	X	X			X	Address conflicts between strategies-e.g..: correct the hydrology in the lower portion of basin so we don't have to correct problems in the upper portion of basin.
29	X				X	Permit applications for improvement of existing or planned navigation channels should include consideration of Coast 2050 strategies.
30	X	X			X	Manage upland watershed hydrology to maximize benefits into the coastal marshes.
31					X	Resolve conflicts between agencies, regions, & resource user groups.
32		X				Region 3-Strategy 11:Protect, restore and maintain ridge functions.
33		X				Region 3 Strategy 17:Reduce sedimentation in bays. add "and in navigational channels".
34		X				KS-Similar to Region 4, Strategy 16 except include "protection as primary function & included with maintenance dredging". (See Sue; R4-16: Stabilize Grand Lake and White Lake shorelines.)
35		X				KS-Protect, restore & maintain land bridge functions from Fresh Water Bayou to the west and Southwest Pass to the east.
36		X				KS-Manage tidal fluctuations that presently allow easy access for salt water intrusion.
37		X				KS-Restore levees along manmade navigation & drainage channels that are currently degrading.
38	X				X	Revamp State & Federal laws that hinder restoration efforts.
39		X	X	X		Reestablish wooded barrier islands, barrier headlands, and cheniers for protection of inland areas, and resting/refueling habitats for neotropical migrant birds. This comment is applicable for all 4 regions.

Table 1b. LCA Comprehensive Study -- Scoping Meeting Comments from Lake Charles, Louisiana, April 16, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	PN	ALT	AE	EC	CC	COMMENT (KS = Keystone)
1		X		X		KS Region 4 Strategy 8, Restore hydrologic conditions; add "and wetland diversity" [R4-8: Restore hydrologic conditions throughout the region to protect wetlands from hydrologic modification and maintain navigation where necessary at major tidal exchange points specifically at the Gulf to lake and lake to marsh interchanges.]
2		X		X	X	KS- Region 4 Strategy 18, Restore shoreline. Restrict recreational vehicles to beach and off the dune. [R4-18: Stabilize the Gulf of Mexico shoreline from Calcasieu Pass to Johnson's Bayou.]
3		X	X			Restore shorelines along GIWW. Similar to Regional 4 Strategy 22, 23 and other strategies [R4-22: Prevent the coalescence of Grand and White lakes. R4-23: Prevent the coalescence of Grand Lake and the GIWW.]
4		X			X	Region 4 Strategy 6. Dredging for beneficial use. [R4-6: Use dedicated dredging or beneficial use of sediment for wetland creation or protection.)
5		X				Extend shoreline protection to Johnson Bayou. Region 4-18: Stabilize the Gulf of Mexico shoreline from Calcasieu Pass to Johnson's Bayou.)
6		X				KS-Restore sediment interruption at Calcasieu & Mermentau Rivers similar to Region 4 Strategy 20 & 21. [R4-20: Restore long-shore sediment flow across the mouth of Calcasieu Pass. R4-21: Restore long-shore sediment across the mouth of Mermentau Ship Channel.]
7		X	X			Tennessee pipeline (west of Holly Beach breakwater) protection from erosion.
8		X				KS-Region 4 Strategy 18: Stabilize the Gulf of Mexico shoreline from Calcasieu Pass to Johnson's Bayou.
9	X		X			Preservation of ecosystem must be incorporated into the study.
10			X			Concern about retention levees at Sabine National Refuge.
11		X			X	Region 4 Strategy 6, dedicated dredging include enhancement. [R4-6: Use dedicated dredging or beneficial use of sediment for wetland creation or protection.]
12	X		X	X		Look at system holistically.
13	X	X			X	Cost factor must consider coastland value to nation.
14	X	X			X	Mermentau basin Region 4 Strategy 3, Sabine river inflow Region 4 Strategy 11. Must consider expanded boundaries [R4-3: Manage watershed to reduce rapid inflows into the Mermentau Lakes Subbasin. R4-11: Maintain Sabine River inflow at levels sufficient to restore and protect wetlands.]
15		X				Region 4 Strategy 1, Lock operation include benefits to wetlands [R4-1: Operate locks to evacuate excess water over that level specified by the USACE structure operational plan from the Mermentau Lakes Subbasin.]
16		X				Add Coastwide Strategy 5 to Region 4 Strategy 6. [Coastwide Strategy 5: Maintenance of Gulf, bay and lake shoreline integrity. R4-6: Use dedicated dredging or beneficial use of sediment for wetland creation or protection.]
17			X		X	Put higher priority on westward extension of Holly Beach breakwaters.
18	X				X	Include education of stakeholders such as maritime industry.

Table 1b. LCA Comprehensive Study -- Scoping Meeting Comments from Lake Charles, Louisiana, April 16, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	PN	ALT	AE	EC	CC	COMMENT (KS = Keystone)
19		X	X			Restore coastline 1.24 miles west of Holly Beach Breakwaters – include consideration of saltwater intrusion into Bayou Triull(?) as there are no buildings past this.
20	X	X				Prevention of saltwater intrusion should be a coastwide strategy.
21		X			X	Keystone - Region 4 Strategy 11. Sabine River flows. Policies need to be considered across Districts to maintain Sabine Lake water management; involve FERC and Sabine River Authority. [R4-11. Maintain Sabine River inflow at levels sufficient to restore and protect wetlands.]
22	X				X	Sabine River Compact need legislation adjustment – Texas Senate Bill 1.
23			X	X		Region 4, Strategy 10-include wave action from ships (R4-10. Control adverse salinity and tidal amplitude in the Calcasieu Ship Channel between the Gulf of Mexico and Calcasieu Lake at levels sufficient to protect and restore existing wetlands.]
24			X	X		Coastwide Common Strategy 7 – add attention to "intra" & "inter" diversity of plants [Coastwide Common Strategy 7: Vegetative plantings.]
25		X				KS-Combine Region 4 Strategy 7-Maintain and divert Atchafalaya River flows westward and Region 4 Strategy 19 strategy into a Keystone strategy. [R4-7: Maintain or direct Atchafalaya River water or other freshwater sources and sediment inflow through the GIWW or other channels. R4-19: Maintain Atchafalaya River mudstream along the Gulf of Mexico region 4 shoreline.]
26	X	X			X	We should start putting a battle line along the coast (i.e. Hwy 82).
27			X	X		We need to be able to "handle" the problem of reduced Sabine River "inflows" to Sabine Lake. Similar to Region 4-Programmatic strategy 9-"Contingency plan for adverse impacts of Texas Water Plan ..." [Region 4 Programmatic Strategy: Contingency plan for the adverse impacts of the Texas Water Development Board Plan (research and development).]
28					X	The beneficiary "stakeholders"-users that caused impacts should pay some (or a share) of the costs of this program retroactively.
29		X	X	X		Region 4 Strategy 6: Use dedicated dredging or beneficial use of sediment for wetland creation or protection. Include "use for wetland preservation". Pump sediment from Calcasieu Ship Channel dredging to restore marsh (i.e. beneficial use of dredged material). Note: agencies prefer spoil to be used to restore marsh.
30					X	Consider "use tax" to help pay restoration costs-specifically oil & gas industry & pipelines
31		X	X	X		Strict adherence to designs for marsh creation.
32					X	Preservation of private land ownership.
33	X	X	X	X	X	Region 4 Strategy 2: New Calcasieu Lock-push forward through CCA process. Leave old lock for water management. [Region 4-2: Operate existing Calcasieu Lock specifically to evacuate excess water, after timely building of a new lock on a parallel channel specifically for navigation and coordinate with the USACE to implement the lock.]

Table 1b. LCA Comprehensive Study -- Scoping Meeting Comments from Lake Charles, Louisiana, April 16, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	**PN**	**ALT**	**AE**	**EC**	**CC**	**COMMENT (KS = Keystone)**
34					X	See minutes from Imperial Calc. Regional Planning Commission – Coastal Zone Management Citizen Advisory Committee (1970s).
35					X	Consider compromises between engineers & environmental scientists.
36		X	X	X		Salinity control at Sabine River at Causeway & Sabine Pass similar to Region 4 Strategy 12 & 13 [R4-12: Salinity reduction of Sabine Lake at the Causeway. R4-13:Salinity control on the east shoreline of Sabine Lake and Sabine Pass.]
37		X	X	X		Reestablish wooded barrier islands, barrier headlands, and cheniers for protection of inland areas, and resting/refueling habitats for neotropical migrant birds. This comment is applicable to all 4 regions.

Table 1c. LCA Comprehensive Study -- Scoping Meeting Comments from Belle Chase, Louisiana, April 17, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	**PN**	**ALT**	**AE**	**EC**	**CC**	**COMMENT (Keystone Strategy = KS)**
						Belle Chase, LA – LCA Scoping Group 1
1		X				KS-River sediment distribution/retention is a keystone strategy.
2				X		Recognize a problem that increasing the size of passes leads to increased tidal flows which in turn leads to increased saltwater intrusion; therefore narrow tidal passes, and armor and harden them with natural materials.
3			X	X		Consider the influence of habitat change on vectors (disease-carrying organisms) such as mosquitoes and birds, and the impacts on insect populations and public health.
4			X	X		Monitor for zebra mussels and other invasive species.
5		X	X	X		Consider closing canals entering navigation channels to reduce wake erosion.
6		X		X		Consider vegetative planting, especially salt tolerant species.
7			X	X		Consider that saltwater intrusion does not exist in brackish and salient marsh.
8			X	X		Consider project impacts on coastal fisheries especially seafood.
9			X	X		Consider the influence of habitat change on bird populations and public health (see also comment #3 above).
10			X	X		Consider implementing a Public Involvement program in restoration projects (especially with regard to sea grasses and marsh plants).
11			X	X		Consider that the introduction of fresh water into the system will increase algae, submerged aquatic vegetation, and the introduction of exotic plant species.
12		X	X	X		Mimic natural processes as much as possible in terms of rates of diverted flows.
13		X	X	X		Create nearshore artificial reefs as part of the barrier complex (using abandoned infrastructure) also in interior bays.
14		X				Consider rebuilding of existing submerged barrier remnants.
15		X	X	X		Freshwater diversion is only needed in a narrow band of marsh immediately adjacent to a river.
16		X	X	X		A few blocks from river, have brackish intermediate saline marsh grasses which have regular saltwater inundation. Too much flooding will drown any marsh.
17			X	X		Barataria salinity regimes have not changed in past 100 yrs. Refer to chart. There are regularly occurring salinity cycles.
18		X	X	X		Restoration Strategies should consider the 3 major causes of wetland loss: (1) Hydraulic modifications to the Louisiana coast, such as at the City of New Orleans with all of its manmade development features. (2) Lack of sediment in the Mississippi River where sediment loads have been reduced by 80%. (3) Subsidence: Due to lack of sediment coming downriver, we won't be able to keep up with the rate of subsidence.
19		X	X	X		Mimic historic riverine processes; determine what year, what stage (historic hydrographs).
20			X	X		Upriver crevasses prevented Delta marshes from flooding/upper basin swamps acted as holding basins (see comment 18)
21					X	Removal of sediment from the Mississippi River for non-restoration purposes should be regulated.
22			X	X		Sediment discharged onto the continental shelf is returned to the estuaries by storm surges, therefore reduction in sediment discharge to the Gulf would impact this process.
23			X	X		Oyster grass is invading the estuary as far north as Lafitte (in small patches). Oyster grass has a tear-away root system and is nature's last effort to vegetate the marsh before erosion.

Table 1c. LCA Comprehensive Study -- Scoping Meeting Comments from Belle Chase, Louisiana, April 17, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	**PN**	**ALT**	**AE**	**EC**	**CC**	**COMMENT (Keystone Strategy = KS)**
						Belle Chase, LA – LCA Scoping Group 2
1			X	X	X	Doug Daigle-testing of sediments for contaminants in advance of dedicated dredging; advise public of said testing; also address nutrient loading concerns associated with diversions.
2		X	X	X		Nancy Walters (USFWS)- Region 2 Strategy 12—would this be a single diversion or multiple crevasses [R2-12: Construct delta-building diversion between Main Pass and Baptiste Collette Bayou (about 50,000 cfs.]
3		X			X	Paul Leboeuf-What is the status of the Ft. Jackson diversion study?
4		X				KS-Benny R-supports Region 2 Strategy 21/22. [R2-21: Extend and maintain barrier headlands, islands and shorelines. Region 2-22: Extend and maintain barrier shoreline from Sandy Point to Southwest Pass.]
5		X				KS-Vickie: Barrier Island Restoration is Keystone strategy even before new diversions.
6			X	X		Consider fault lines in planning of restoration activities.
7		X	X	X		Encourage several small diversions versus a single large diversion such as Myrtle Grove.
8		X	X	X		Consider location of Happy Jack (for diversion) because of closeness of the Mississippi River to marsh.
9		X				When will strategies go into specific detail engineering? after approval of programmatic plan?
10		X				Figure out a way to get sediment out of the river (Mississippi River).
11		X				KS- Barrier Island restoration
12		X				Control salinity to reduce saltwater intrusion.
13		X	X	X	X	Any diversion needs to have outfall management.
14		X	X	X		With mini siphons/diversion can control salinity.
15				X		Consider soil salinity in dedicated dredging projects.
16			X	X		Concerned about excessive nutrients in river diversion. Explain that marsh can absorb nutrients.
17	X	X			X	EIS-how will EIS process reflect community, infrastructure, cultural etc. benefits of restoration effort?
18						Link marsh/land use/traditional uses (orange groves), survivability of communities—human environment.
19	X	X			X	Is closing the Mississippi River Gulf Outlet (MRGO) receiving serious consideration?
20	X	X	X	X		Is there consideration regarding an alternative navigation channel west of the Mississippi River—very concerned about adverse effects similar to MRGO—we should learn from our mistake.
21		X				KS-Barrier Islands restoration.
22				X		Consider using compost materia such as yard waste from New Orleans in marsh creation; perhaps in Caminda Bay mapping unit Region 2 Programmatic Strategy 3. Consider other locations (for restoration), particularly closer to metropolitan areas. [Region 2 Programmatic Strategy 3: Use alternative sources of sediment such as red mud, compost, etc. (Caminada Bay mapping unit).]
23		X			X	Hopper dredges-figure out a way to beneficially use that material.
24		X			X	More beneficial use of Mississippi River/Baptiste Collette (sediments, dredged) material.

Table 1c. LCA Comprehensive Study -- Scoping Meeting Comments from Belle Chase, Louisiana, April 17, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	PN	ALT	AE	EC	CC	COMMENT (Keystone Strategy = KS)
25		X			X	Southwest Pass dredging-reduce/eliminate dumping dredge material into the Gulf.
26	X	X				Identify benefits of projects to metropolitan areas.
27		X				Sediment trap-develop dredge to utilize material (in an efficient way) collected in sediment trap or retain dredge in "local" control (parish) so that dredge remains in area for periodic use.
						Group Summary Keystone Strategies: Barrier Islands; Diversions-strong encouragement of using multiple smaller diversion w/outfall mgt;and better, more complete, beneficial use of Mississippi River dredged material particularly in the delta
						Belle Chase, LA Scoping Comments Group #3
1		X				Navigation lock above mouth of Mississippi River – new channel for navigation – allow current channels to silt up.
2		X	X			Dredge material from Mississippi River and place it in Bastian Bay instead of using a diversion alone to accomplish this.
3		X				Keystone-(13) Good alternative that should be given priority. [R2-13: Construct a delta-building diversion into the American Bay/California Bay area (about 100,000 cfs).]
4		X			X	Investigate use of sediment from dams in upper Mississippi River watershed.
5	X					Adopt the entire Coast 2050 Plan for construction.
6		X				KS- Extend and maintain barrier islands which is combination of Region 2 Strategies16, 18, 19, and 21. [R2-16. Dedicated dredging and/or beneficial use of dredged material to create marsh in the Clovelly, Little Lake, Caminada Bay, and Fourchon mapping units. R2-18: Gap spoil banks and plug canals in lower bay marshes. R2-19: Construct wave absorbers at the heads of bays. R2-21: Extend and maintain barrier headlands, islands and shorelines.]
7		X				KS- Extend barrier shorelines similar to: Region 2-21: Extend and maintain barrier headlands, islands and shorelines. R2-22: Extend and maintain barrier shoreline from Sandy Point to Southwest Pass. .
8		X				KS – Dredge and pump sand from Mississippi River wherever possible
9					X	Mineral Management Service (MMS) activities have to be consistent with Coast 2050 plan (note an ongoing EIS being prepared by MMS).
10				X		Appropriate mitigation for pipeline and other activities within coastal zone (mitigate in affected parish).
11		X				KS- Region 2-6: Enrich existing diversions with sediment. R2-8: Construct small diversions into marsh with outfall management.
12					X	Impact of Millennium Port.
13		X		X		Use rock to restore barrier islands and restrict tidal prism.
14			X	X	X	Water quality from Mississippi River diversions should be addressed.
15		X	X	X		Fallacy that freshwater alone will create marsh. Sediment builds marsh faster.
16		X				KS-Need many large sediment diversion structures-as many as possible [R2-10, 11, 12, 13, 14; R2-10: Construct a delta-building diversion in the Myrtle Grove/Naomi area (about 15,000 cfs). R2-11: Construct delta-building diversion in Bastian Bay/Fort Jackson area (about 15,000 cfs). R2-12: Construct delta-building diversion between Main Pass and Baptiste Collette Bayou (about 50,000 cfs). R2-13: Construct a delta-building diversion into the American Bay/California Bay area (about 100,000 cfs). R2-14: Construct delta-building diversion through controlled crevasses into the Quarantine Bay area.
17	X				X	Skimmers from shrimping operations destroy marsh. Restrictions to this activity should be considered.
18		X				Region 1 Strategy 17:17. Close MRGO to deep draft navigation when adequate container facilities exist on the river

Table 1c. LCA Comprehensive Study -- Scoping Meeting Comments from Belle Chase, Louisiana, April 17, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	**PN**	**ALT**	**AE**	**EC**	**CC**	**COMMENT (Keystone Strategy = KS)**
19		X				Region #1-revisit Lake Pontchartrain barrier plan.
20	X				X	Expedite development of action plan and resources to rebuild facilities after a major storm or other events.
21		X				Divert Southwest Pass sediments westward-diversion in Block 52 & 53.
22		X				KS Region 2 Strategy15: Prevent the loss of bedload into deep gulf waters off the Continental Shelf by relocating the Mississippi River Navigation Channel.
23				X	X	Publicize (study/project) successes.
24					X	Obtain right of eminent domain for coastal restoration.
25					X	Communication with citizens about meetings etc., such as posting notices at boat launches, marinas, and utility poles.
26					X	Courses at high schools, etc. about coastal issues.

Table 1c. LCA Comprehensive Study -- Scoping Meeting Comments from Belle Chase, Louisiana, April 17, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	**PN**	**ALT**	**AE**	**EC**	**CC**	**COMMENT (Keystone Strategy = KS)**
27						Belle Chase, La Scoping Comments Group #4
28		X				KS- Region 2 Strategy 21: Extend and maintain barrier headlands, islands and shorelines.
29				X		What good are diversions during low river?
30				X		Need monitoring of nutrients delivered in freshwater diversions (needs to meet nutrient criteria).
31	X				X	Public input accepted throughout (study/project) process.
32		X	X	X		KS- Freshwater diversions are not putting out enough sediment.
33	X	X	X	X	X	How will you protect oysters with restoration projects like freshwater diversion?
34		X				Can we increase sediment delivery in existing diversions [Region 2-6: Enrich existing diversions with sediment.]
35	X		X	X		Reduce the size of tidal passes.
36		X		X	X	Monitor river water quality in diversions.
37		X		X	X	Ensure target salinities are not harmful to oysters and other marine fisheries.
38		X	X	X		Consider that good effects of freshwater diversions are lost, when river too low to divert.
39		X		X	X	Need monitoring of sediments (contaminants, toxics, etc.) in fish and wildlife.
40		X				Reduce tidal flow in manmade canals [Region 2-18: Gap spoil banks and plug canals in lower bay marshes.]
41		X				Slow tidal movement. Restore barrier islands, reduce tidal passes. [Region 2-21: Extend and maintain barrier headlands, islands and shorelines. R2-22. Extend and maintain barrier shoreline from Sandy Point to Southwest Pass.]
42		X		X		Consider that freshwater diversions are ineffective against wind-driven tides in large open water areas.
43			X	X	X	Need cooperation of rest of U.S. to clean up the river (Mississippi River) so it is safe to divert into wetlands.
44					X	Hold permittees accountable for erosion control. Seek cooperation to repair past damages and in the future (future potential damages).
45					X	This plan should include ideas to restore areas damaged pre-Section 404 unpermitted activities such as oil, gas, navigation, and Superfund sites.
46	X	X	X	X	X	Use lessons learned on barrier island/shoreline restoration projects (Grand Isle, Raccoon Island) to plan future projects.
47	X	X	X	X	X	Better coordination between (Section) 404 permitting & coastal restoration.
48	X				X	Special emphasis on Can we speed up this process? It is costing more to restore every day.
49		X	X			Restore islands in interior bays (such as in St. Mary's Parish).
50	X				X	Make sure you request enough money to do the job.
51					X	Need better meeting announcements.
52		X				Region 1 Strategy 9: Dedicated delivery of sediment for marsh building.
53		X	X	X		Reestablish wooded barrier islands, barrier headlands, and cheniers for protection of inland areas, and resting/refueling habitats for neotropical migrant birds. This is applicable to all 4 regions.

Table 1d. LCA Comprehensive Study -- Scoping Meeting Comments from Hammond, Louisiana, April 18, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	**PN**	**ALT**	**AE**	**EC**	**CC**	**COMMENT (Keystone Strategy = KS)**
1	X	X	X	X	X	Urban sprawl should be considered in the study.
2		X	X	X		Hurricane impacts should be considered in study.
3		X	X	X		Climate change should be considered in study.
						Specific Comments
1		X	X	X		KS--River diversions through wetlands are Keystone Strategy.
2		X	X	X		KS--Restoration measures should mimic natural processes. Most importantly sediment from the Mississippi River.
3		X				KS--Will water come in through Bayou Manchac and Lutcher and Bonne Carre?
4		X		X		KS--More fresh water into Lake Pontchartrain to push back the saltwater.
5		X				Concern with region 3 strategies to better address the goals of the Coast 2050 plan.
6		X				KS--(prevent) shoreline erosion in Lake Pontchartrain.
7		X	X	X		Consider the pros and cons of all the restoration strategies.
8		X	X	X		Are we measuring subsidence effectively? Consider this in all strategies.
9		X	X	X	X	Consider all methodologies for restoration.
10		X			X	KS--Necessary modification to navigation channels to optimize sediment distribution (continental shelf).
11					X	Consider private landowners and incentives for landowner cooperation in restoration efforts.
12		X				Use Bonne Carre as a 3rd diversion; especially over the west guide levee and into Bayou Trapanee on the east side. Also, use the Interstate-55 borrow canal as conveyance channel. Multiple use benefits should be considered.
13		X	X	X		Consider Atchafalaya Basin reforestation as well as reforestation of the entire coast.
14	X	X	X	X	X	Anticipate potential problems to avoid problems (such as oyster leases).
15			X	X		Consider wetland loss in the western side of the state.
16	X	X	X	X	X	Use of Bonne Carre (as tool for restoration) is critical because of human development.
17		X	X	X		KS--Close the MRGO.
18		X	X	X		Consider dedicated dredging along shorelines to hold water from freshwater diversions.
19			X	X		Will (existing coastal wetlands) maintain or gain with this (study keystone strategies) process?
20			X	X		Are we considering future reduction of freshwater availability in the entire Mississippi River Basin?
21		X	X	X		Consider short-term massive diversions (pulses every 15 years of 4 months duration) coastwide 50,000 cfs or greater.
22		X				Consider gabions for shoreline protection and land building (a la Turtle Cove).
23	X				X	More public education and awareness of all the restoration plans.
24	X	X	X	X		Need comprehensive management plan for Mississippi River restoration for lower river below D-ville.
25	X	X			X	Avoid marsh management structures when possible.
26		X				Use waste water similar to Region 1 strategy 7: A small diversion of Jefferson Parish drainage into LaBranch wetlands.

Table 1d. LCA Comprehensive Study -- Scoping Meeting Comments from Hammond, Louisiana, April 18, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	**PN**	**ALT**	**AE**	**EC**	**CC**	**COMMENT (Keystone Strategy = KS)**
27		X				Siphons in E. LaBranche similar to Region 1 Strategy 6, Bayou Manchac, Manchac WMA [Region 1-6: A small diversion of the Mississippi River into LaBranch wetlands.]
28		X				Coastwide Strategy 3: Herbivory control (especially of nutria).
29		X	X	X		Control saltwater intrusion in man-made channels.
30		X		X		Will SAV (subaquatic vegetation) be part of the restoration strategy, especially in Lake Pontchartrain?
31		X				Region 2: closure of select existing passes in the Mississippi River Delta to make water available for diversions.
32		X				Region 1 Strategy 15: Maintain Eastern Orleans Land Bridge by marsh creation and shoreline protection.
33		X				Region 1 Strategy 14: Maintain Chandeleur Islands and investigate enhancing restoration by requesting special exemption from the wilderness area restrictions from Congress.
34		X				(Implement) Freeport Sulphur canal diversion for Region 2.
35		X				Consider the Industrial Canal lock replacement as diversion opportunity.
36			X	X		Pay more attention to Lake Maurepas system and the alterations that have occurred.
37		X	X	X		Consider abandoned oil field canals for diversions.
38			X	X		Storm water management and sewage treatment on north shore of Lake Pontchartrain.
39	X				X	Continue public meetings.
40	X				X	Coordinate with other restoration efforts (i.e. Lake Pontchartrain National Estuary program).
41		X				Barrier shoreline restoration.
42		X	X	X		Reestablish wooded barrier islands, barrier headlands, and cheniers for protection of inland areas, and resting/refueling habitats for neotropical migrant birds. This is applicable to all 4 regions.

Table 1e. LCA Comprehensive Study -- Scoping Meeting Comments from Thibodaux, Louisiana, April 22, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	PN	ALT	AE	EC	CC	COMMENT (Keystone Strategy = KS)
1		X				Implement conveyance channel strategy similar to Region 2 Strategy 17 and Region 3 Strategy 9 [R2-17: Construct a large conveyance channel to create a delta lobe in Little Lake and Caminada Bay mapping units. R3-9: Build land in upper Timbalier Subbasin by sediment diversion from the Mississippi River via a conveyance channel.]
2		X			X	Conveyance channel should be #1 priority for LCA. CWPPRA should handle supporting strategies.
3	X				X	The LCA Comprehensive Study should be expedited to move projects to construction more rapidly. As specified by the Restore or Retreat organization which has about 100 members.
4		X	X	X		KS-Pushing back saltwater is a priority need. Using Mississippi River sediment-laden water is a Keystone Strategy.
5		X	X	X		KS-. Not wasting sediment laden water at the delta.
6		X	X	X		KS-Using Mississippi River freshwater & sediment is a Keystone strategy. Flooding & fisheries issues need to be addressed.
7		X				KS-Region 2 Strategy -9: Use of riverine sediments through sediment trap or a series of sediment traps and slurry pipelines would be a Keystone strategy; see Plaquemines Parish applications. [R2-9: Construct a sediment trap in the Mississippi river south of Venice and utilize the material to create marsh and/or restore barrier islands.]
8		X				Region 2 Strategy 9: Construct a sediment trap in the Mississippi river south of Venice and utilize the material to create marsh and/or restore barrier islands.
9	X				X	Contact Barataria Terrebonne National Estuary Program (BTNEP) for assistance in planning & publicizing public meetings. Public input and education is critical to restoration effort.
10		X	X	X	X	Restoration projects should consider flood protection projects such as the Morganza to Gulf study.
11	X	X				Restore, protect, and maintain barrier islands, ridges and land bridges.
12	X	X			X	Top priority should be given to large scale projects such as conveyance channel. All restoration efforts should act as an integrated plan.
13		X	X	X		Restoration should have a defined, measurable target or goal.
14		X	X	X		Keystone strategies should involve restoration utilizing natural processes.
15					X	Need to reach out to public conservation organizations to get their assistance and input (Coastal Conservation Association, Ducks Unlimited).
16	X	X			X	See comments 1 & 2 above regarding the Conveyance Channel. The implementation of large-scale projects takes time, hence protection of existing infrastructure needs to be addressed in the interim.

Table 1e. LCA Comprehensive Study -- Scoping Meeting Comments from Thibodaux, Louisiana, April 22, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	PN	ALT	AE	EC	CC	COMMENT (Keystone Strategy = KS)
17		X			X	See conveyance channel comments 1, 2, and 15 above; these should be given #1 priority. Conveyance channel should have a study of its own under LCA, as soon as possible. In the interim, use CWPPRA to manage salinity and manage (land) loss.
18	X				X	Large-scale projects need to coordinated with all other transportation and industrial infrastructure.
19	X				X	Work with environmental organizations to get a broader distribution of information and greater public involvement. Coalition to Restore Coastal LA
20	X				X	Educate public using laymans terms, involve local civic organizations such as the Chambers of Commerce. Provide speakers and presentations at these groups meetings; such as the South Central Industrial Association and their established meetings & events.
21	X	X			X	Emphasis on ecosystem restoration (multiple feature restoration).
22	X				X	Keep key people in public organizations involved to help spread information and educate the public.
23	X				X	Consider that projects currently being implemented for restoration are not adequate to solve the problems.
24	X	X				How will the implementation (of keystone strategies) order be determined?
25		X				Develop and support Region 3 Strategy 4: Enhance Atchafalaya River influence to Terrebonne Basin marshes, excluding upper Penchant marshes (Minors Canal/Bayou DuLarge to Bayou Lafourche).
26		X			X	Include: "Eliminate any new" for Region 3 Strategy 10: Restore historic hydrologic conditions of major tidal exchange points or prevent adverse tidal exchange points between the Gulf/lake, lake/marsh, bay/marsh, Gulf/bay and marsh/navigation channel locations.
27	X	X			X	Include: "Flood Protection" in Region 3 Strategy 7: Maintain or direct Atchafalaya River water or other freshwater sources and sediment through the GIWW or other water sources.
28	X	X			X	Include "Develop and support" in Region 3 Strategy 4: Enhance Atchafalaya River influence to Terrebonne Basin marshes, excluding upper Penchant marshes (Minors Canal/Bayou DuLarge to Bayou Lafourche).
29	X	X			X	Include "Multipurpose control of Houma Navigation Channel" in Region 3 Strategy 5: Establish multipurpose hydrologic control of any navigation canals.
30	X	X				Include "Eliminate any new" in Region 3 Strategy 10: Restore historic hydrologic conditions of major tidal exchange points or prevent adverse tidal exchange points between the Gulf/lake, lake/marsh, bay/marsh, Gulf/bay and marsh/navigation channel locations.
31		X				Include "Directional drilling" in Region 3 Strategy 12: Maintain shoreline integrity and stabilize critical areas of Vermilion, East and West Cote Blanche, Atchafalaya, Caillou, Terrebonne and Timbalier Bay systems including the Gulf shoreline.

Table 1e. LCA Comprehensive Study -- Scoping Meeting Comments from Thibodaux, Louisiana, April 22, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	**PN**	**ALT**	**AE**	**EC**	**CC**	**COMMENT (Keystone Strategy = KS)**
32		X				Include "Amend Falgout Canal" in Region 3 Strategy 13:Construct interior islands and/or reefs to protect bay/lake shoreline and/or to restore hydrology.
33		X				Include "Flood protection" in Region 3 Strategy 14: Restore and maintain the barrier islands and Gulf shorelines such as Isle Dernieres, Timbalier barrier island chains, Marsh Island, Point au Fer and Cheniere au Tigre (including back barrier beaches).
34		X	X	X		Reestablish wooded barrier islands, barrier headlands, and cheniers for protection of inland areas, and resting/refueling habitats for neotropical migrant birds. This is applicable to all regions.

Table 1f. LCA Comprehensive Study -- Scoping Meeting Comments from Morgan City, Louisiana, April 24, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	PN	ALT	AE	EC	CC	COMMENT (Keystone Strategy = KS)
1		X				Expand beneficial use of dredged material similar to Region 3 Strategy 8 and curtail prop wash as an acceptable dredge technique. [R3-8: Dedicated delivery and/or beneficial use of sediment for marsh building by any feasible means.]
2		X			X	Consider diversions from Atchafalaya River to areas experiencing land loss; similar to Region 2 Strategy 7 and Region 3 Strategy 4. [R2-7: Continue building and maintaining delta splays. R3-4: Enhance Atchafalaya River influence to Terrebonne Basin marshes, excluding upper Penchant marshes Minors Canal/Bayou DuLarge to Bayou Lafourche).]
3		X		X	X	Reconsider placement of material dredged from the Atchafalaya River Bar Channel to the western side of the bar channel instead of in the eastern side ODMDS (Ocean Dredged Material Disposal Site).
4	X				X	Consider upstream influences and address nutrients coming into the region.
5	X	X	X	X		Highly urgent need for restoration of Terrebonne Basin NEXT (emphasis on next).
6	X	X			X	Address siltation of natural bayous in St. Mary parish and coordinate with local landowners.
7	X	X				Focus on areas with highest landloss rates specifically Barataria and Terrebonne parishes.
8		X				Use water and sediments from Mississippi River, especially conveyance channel alternative and the 3rd delta alternative, with consideration given to water quality, fisheries, and flooding issues.
9	X	X				Use water and sediments from Atchafalaya River for restoration of Barataria, Terrebonne, and western Lafourche parishes.
10	X		X	X		Continue barrier island and land bridge restoration.
11					X	Inform and educate the public better. Public notices should be in simpler format with one simple message written to the 1st grade level. Address user groups, clubs, etc.
12					X	Notify industry stakeholders, oil & gas, pipeline, marine transportation, sugarcane, fisheries, port commissions, emergency planning, banking,
13		X				Consider restoration with slurry of sediments by pipeline.
14			X	X		Concern with exposure of pipelines due to erosion.
15					X	Implementation of Coast 2050 strategies may satisfy most of the public's reason for lack of additional participation at scoping meetings.
16		X	X	X		Maximum use of riverine resources. Restoration of barrier shorelines to achieve keystone criteria include Atchafalaya and Mississippi Rivers. This is essential to include conservation of water as both are driver and a constraint.
17		X			X	KS- Keystone strategy is combination of the following strategies: Region 3 Strategy 15: Optimize GIWW flows into marshes and minimize direct flow into bays. And Region 3 Programmatic Strategy 5: Establish multi-purpose control of HNC of other navigation channels (freshwater and sediment distribution salinity control, hurricane protection and navigation).

Table 1f. LCA Comprehensive Study -- Scoping Meeting Comments from Morgan City, Louisiana, April 24, 2002. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	PN	ALT	AE	EC	CC	COMMENT (Keystone Strategy = KS)
18		X			X	KS-Include Multiple use of Houma Navigation Canal by embracing construction of lock in the canal. Also include Region 3 Strategies 2, 4, 7, and 15 to achieve Region 3 Programmatic Strategy 5. [R3-2:Increase deltaic land building where feasible. R3-4: Enhance Atchafalaya River influence to Terrebonne Basin marshes, excluding upper Penchant marshes (Minors Canal/Bayou DuLarge to Bayou Lafourche). R3-7: Maintain or direct Atchafalaya River water or other freshwater sources and sediment through the GIWW or other water sources. R3-15: Optimize GIWW flows into marshes and minimize direct flow into bays. Region 3 Programmatic Strategy 15: Water quality/wastewater management (Merchant De Cade mapping unit).
19		X	X	X		KS-Consider Conveyance Channel and its necessary and ancillary impacts.
20	X					Focus on central Terrebonne Parish for restoration.
21	X	X				KS-Emphasize urgency of restoring Terrebonne Parish; especially Region 3 Strategies 4, 6, 8, 12, 14, and 15. (Region 3 Strategy 4: Enhance Atchafalaya River influence to Terebonne Basin marshes, excluding upper Penchant marshes (Minors Canal/Bayou DuLarge to Bayou Lafourche). [R3-6: Stabilize banks and/or cross sections of any navigation channels for water conveyance and/or for restoring hydrology of adjacent marshes. R3-8: Dedicated delivery and/or beneficial use of sediment for marsh building by any feasible means. R3-12: Maintain shoreline integrity and stabilize critical areas of Vermilion, East and West Cote Blanche, Atchafalaya, Caillou, Terrebonne and Timbalier Bay systems including the Gulf shoreline. R3-14: Restore and maintain the barrier islands and Gulf shorelines such as Isle Dernieres, Timbalier barrier island chains, Marsh Island, Point au Fer and Cheniere au Tigre (including back barrier beaches). R3-15: Optimize GIWW flows into marshes and minimize direct flow into bays.]
22	X		X			Coastal inland marshes in Terrebonne Parish are in urgent need of help.
23	X		X			Restoration of natural ridges and natural levees (as per Region 3 Strategy 11). Include restoration of land bridges and barrier islands. [R3-11: Protect, restore, and maintain ridge functions.]
24	X				X	Study should consider proposed navigation projects and navigation interests.
25	X	X			X	Use existing Atchafalaya River, GIWW, and Houma Navigation Channel as conveyance channels.
26	X		X	X		Consider the entire Atchafalaya Basin Floodway in the study, from Old River Structure to Gulf.
27		X	X	X	X	Add to Region 3 Strategy 6: "to protect adjoining marshes. [R3-6: 6. Stabilize banks and/or cross sections of any navigation channels for water conveyance and/or for restoring hydrology of adjacent marshes.]
28	X				X	Build CWPPRA Penchant Basin project, and NRCS TE43 project (GIWW bank stabilization).
29	X					For all restoration efforts, add the terms "Preserve and Protect".
30	X				X	Seek nationwide support.
31	X					Add letter "a" to slide: "Coast-benefit Analysis".
32		X	X	X		Reestablish wooded barrier islands, barrier headlands, and cheniers for protection of inland areas, and resting/refueling habitats for neotropical migrant birds. This is applicable to all regions.

Table 1g. LCA Comprehensive Study -- letter and email Scoping Comments. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	PN	ALT	AE	EC	CC	COMMENT (Keystone Strategy = KS)
1	X	X	X	X	X	Written comments provided by Mr. Michael Critic, President of RESTORE at the April 16, 2002 Scoping Meeting include: (1) holistic, rather than piecemeal approach to environmental restoration. (2) support for interim measures such as the Cameron breakwater project. (3) Consider gyral and hydrologic impacts of the jetty located at Calcasieu River for restoration. (4) Broadened thinking and study and consideration of lessons learned. (5) Restore and maintain natural hydrology such as may be meant by Region 4 Recommendation #10. (6) Loss of renewable resources in the coastal zone is because shortsighted developmental activities have focused on exploitation of depletable resources. (7) Consider that some projects will not work and are not justifiable. (8) Reconfiguration or removal of the Calcasieu jetties. (9)Use the Calcasieu situation as a model for holistic study.
2		X				Letter dated Apr 17, 2002 from Mr. & Mrs. J.M. Mouton: "Subject: Abbeville Meeting, LSU Ag 4-15-02. I was at your meeting and my card # was 4. I brought up the idea of wooden pilings and tires to build up land on the Louisiana coastline. That has proven itself at Rutherford Beach, Slemco, Transla, and Beauregard Electric will sell treated posts for the least amount of dollars. Tires are available at many places. My name is Joseph M. Mouton, phone is 337-643-7474. Sincerely J.M.M."
3	X				X	Letter dated Apr 22, 2002 from Perrin, Landry de Launay, Dartez, & Ouellet, Attorneys at Law, A Partnership of Law Corporations, P. O. Box 53597, Lafayette, Louisiana 70505. Letter requested that any comprehensive restoration effort should include a provision which would remove the conflict situation (Louisiana law dictates that the state gains title to the minerals when land become submerged) and provide that landowners cannot be deprived of their mineral ownership if their land becomes submerged. (see copy of letter in appendix).
4	X	X			X	Email response to Scoping Questions posted on Coast 2050 web site Thursday, April 18, 2002 8:20 PM. See attached full copy of comments). Summary of comments: (1) In Regions 1 & 2: speed up the restoration process by building marsh before complete construction of diversions. (2) Suggest a diversion through the west bank of Southwest Pass into the area of West Delta Blks 52, 53 & 54. (3) Also, many people in lower Plaq. Parish want touse rock where ever possible to restore some of the structure which controlled the tidal prism. (4) Dredge the Empire waterway, beneficial use of dredged material, (5) Political influences (6) Restoration in areas that would benefit versus areas that are already lost, and (7) Flexibility of applying Coast 2050 restoration strategies.
5	X	X	X	X	X	Email from Mr. Mark Davis that has several detailed recommendations/concerns was originally presented at from December 11, 2001 meeting held at the USACE- New Orleans District and a January 30, 2002 environmental briefing. Comments included (1) concensus building; (2) authority/stratigic issues; (2) timing issues; (3) project management issues; (4) technical issues; (5) and hypoxia issues.
6					X	Handwritten comment from April 15, 2002 Abbeville, La scoping meeting: MMS Draft impact statements which are not taking into account the Coast 2050 Plan. Currently 2 draft EIS ongoing lease sales 2003-2007.

Table 1g. LCA Comprehensive Study -- letter and email Scoping Comments. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	PN	ALT	AE	EC	CC	COMMENT (Keystone Strategy = KS)
7	X	X	X	X	X	Handwritten comment from April 15, 2002 Abbeville, La scoping meeting: I am a resident of Region 1 and endorse the following Keystone Strategies: (a) #15 maintain East Orleans Land Bridge [Region 1 Strategy 15: Maintain Eastern Orleans Land Bridge by marsh creation and shoreline protection.] (b) # 10 Maintain Shoreline Integrity of Lake Pontchartrain [Region 1 Strategy 10: Maintain shoreline integrity of Lake Pontchartrain to protect regional ecosystem values.] and (c) close MRGO #17 [Region 1 Strategy 17: Close MRGO to deep draft navigation when adequate container facilities exist on the river.]
8						Lee P. Gary, Jr. [SMS_USA@compuserve.com], email request on May 5, 2002 to be included on the study mail list and receive a copy of all study-related documents. Provided Mr. Gary with copy of scoping meeting announcement, Notice of Intent, and referred him to web site (www.coast2050.gov) and scoping meeting powerpoint presentation.
9	X	X	X	X	X	May 7, 2002 letter from Mr. Roy Williams Chairman of the Gulf of Mexico Fishery Management Council comments include: (1) recognition of the importance of coastal wetlands and waters and supports any effort to restore these ecologically valuable areas. (2) The Council has jusidiction in federal waters under Section 305 of the Magnuson-Stevens Act of 1966. (3) The Council feels that estuarine and marine fishery resources, including essential fish habitat receive high priority when examining coastal restoration strategies. (4) The Council cautions against overzealous tidal exchange control at the expense of ingress/egress fo estuarine dependent species. (5) The Council supports Region 3 Regional Programmatic Strategy 6 which calls for statewide plan for management of surface and groundwater supplies. (6) The Council is also concerned with Region 4 Regional Programmatic Recomendation 4 which calls for "limited esturarine organism access". The Council recommends that estuarine organism access be maximized to the extent possible in conjunction with other programmatic goals of the plan.
10	X	X	X	X	X	E-mail and letter received May 7, 2002 from Mr. Doug Daigle, Hypoxia Program Director of the Mississippi River Basin Alliance provided the following comments: (1) Reconciling restoration efforts with other concerns such as the permitting process. Concern with development being allowed in areas directly at risk or projected to be vulnerable to wetland loss. (2) Region 1 Programmatic Recommendation should include reducing draining and development of marshes and forested wetlands. (3) Conduct adequate testing of dredged material for toxic contamination prior to beneficial use. (4) Multiple benefits: coordination of study efforts with other ecosystem restoration efforts including the Maurepas Swamp Diversion, Caernarvon Diversion. (5) Consideration of climate change impacts including monitioring and research on the Mississippi River delta's role in the carbon "budget" of North America. (6) Restrict dredging of the Pearl River. (7)Establish a National Esturarine Research Reserve in Louisiana. (8) Expansion of the Joyce and Manchac WMAs. (9) Support the Bayou Lafourche Siphon and Pump Project. (10) Support the use of alternative sources of sediment, such as compost.

Table 1g. LCA Comprehensive Study -- letter and email Scoping Comments. P&N = Purpose and Need; ALT = Alternatives; AE = Affected Environment, EC = Environmental Consequences; CC = Consultation & Coordination.

PSEIS Section Comment Addressed						
#	PN	ALT	AE	EC	CC	COMMENT (Keystone Strategy = KS)
11	X	X	X	X	X	By letter dated May 7, 2002 Mr. Allan Ensminger commented: (1)Construct a saltwater barrier in the Interharbor Canal to prevent saltwater intrusion, from the MRGO adversely impacting the LaBranche Wetland Ecosystem. (2) Consider and give top priority to additional "dredge and fill" restoration sites along the Lake Pontchartrain shoreline. (3) Consider that diversion of Mississippi River water into the La Branche Wetlands "would be difficult due to the development area along the natural levee system of the river." (4) An additional obstacle for meaningful freshwater introduction is the newly constructed St. Charles Hurricane Protection Levee. (5) Utilize the Bonnet Carre Spillway annually.
12	X	X	X	X	X	Letter and fax dated May 8, 2002 from Mr. George A. Strain, Vice President of the Continental Land & Fur Co., Inc. provided several comments: (1) Is a landowner who has managed its property for over 70 years. (2) Different marsh types need management different approaches. (3) Support the beneficial use of dredged material and questions the regulatory encouragement of prop or wheel wash and the requirement for mitigation of beneficially used dredged material placed onto old spoil banks. (4) Navigation channels have eroded beyond their original channels and the Corps of Engineers should compensate affected landowners. (5) Also presented was a list of 10 specific revisions to Region 3 regional strategies.
13	X	X	X	X	X	May 8, 2002 letter from Ms. Lori LeBlanc, Exceutive Director of Restore or Retreat comments: (1) Support large-scale restoration strategies that will benefit the Barataria and Terrebonne basins. (2) Identify the most critical issue is the astronomical land loss in Louisana. (3) The signifcant issues related to Louisiana's coastal restoration effort are simultaneously restoring the estuarine system, while building land and providing flood protection. (4) The Mississippi River is the area's most valuable resource for effectively restoring coastal Louisiana. (5) Involve the public and stakeholders. (6) Support further analysis of the Third Delta Conveyance Channel strategy. (7) Support near term strategies that could prevent further intrusion of the Gulf of Mexico while the Conveyance Channel is built and implemented, such as strategic pipeline sediment diversions, land bridge restoration, and barrier island restoration.
14	X	X	X	X	X	By letter dated May 9, 2002, Mr. David W. Fruge, Supervisor, Louisiana Field Office, U.S. Fish and Wildlife Service provided following scoping comments: (1) the USFWS plays significant role in the LCA Comprehensive Study; service personnel serve on Framework Development Team and the Regional Project Development Team. (3) List of significant fish and wildlife resources that should be addressed in in the PSEIS (4) Recommend careful consideration of potential project-induced impacts to the 10 National Wildlife Refuges throughout coastal Louisiana. (5) The USFWS will continue to work closely with staff on preparation of the feasibility study and the associated PSEIS; prepare a Fish and Wildlife Coordination Act report on the recommended plan; provide current list of Federally listed threatened and endangered species and information on their critical habitat.

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OTHER (LETTERS, EMAIL, ETC.) SCOPING COMMENTS

Subject: Abbeville Meeting, LSU Ag 4-15-02

I was at your meeting and my card # was 4. I brought up the idea of wooden pilings and tires to build up land on the Louisiana coastline). That has proven itself at Rutherford Beach. Slemco, Cleco, Transla,and Beauregard Electric will sell treated posts for the least amount of Dollars. Tires are available at many places. My Name is Joseph M. Mouton, Phone is 337-643-7474. Sincerely J.M.M.

Date printed: Apr 17 2002

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April 22,2002

William P. Klein. Jr.
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RE: Louisiana Coastal Area Comprehensive Study

Dear Mr. Klein:

Please consider the following as a written comment to be considered in connection with the above-captioned study on wetlands restoration: As counsel for a member of the Aristide Broussard family, owners of approximately 3,000 acres in southern Vermilion Parish (some tracts being situated on the northern edge of Vermillion Bay), this will advise that we have lost considerable land due to erosion and the State of Louisiana claimed title to those mineralrights affecting said lands. In as much as Louisiana law dictates that the state gains title to the minerals when land becomes submerged (becomes part of the "water bottom"), it is palpable that the state is in a conflict of interest because by failing to work diligently in preventing wetland erosion, the state implicitly enriches itself by increasing its ownership of lands capable ofand paying mineral royalties. Therefore, any comprehensive effort should include a provision which would remove the conflict situation and provide that landowners cannot be deprived of their mineral ownership if their land becomes submerged.

With best wishes. I remain,

Very truly yours,

PERRIN, LANDRY, deLAUNAY, DARTEZ & OUELLET

WARREN A. PERRIN

WAP/dsb

cc: ABHP Committee

Klein, William P Jr MVN

From: Chris Cretini [chris_c@condor.nwrc.gov]
Sent: Friday, April 19, 2002 8:18 AM
To: Jon Porthouse; Bill Klein
Subject: Fw: Scoping Survey

This is a response to the scoping questions on the website. I'll send you all responses but I will also keep a list of those who request a copy of the scoping report. If I should send these to anyone else please let me know.

Thanks,
Chris

-----Original Message-----
From: None [mailto:None]
Sent: Thursday, April 18, 2002 8:20 PM
To: chris_c@condor.nwrc.gov
Subject: Scoping Survey

Name: None
Email: None

Question 1: In areas of region two that are in close proximity to the river and are canidate areas for diversions, initially dredging material and building marsh structure prior to diversions would speed up the restoration process. This should be a keystone stratergy because: (1.) It would do the most good in the shortest time,(2.)It would reduce the amt. of pollutants put into the marsh & (3.)It would save sediment which is now going off of the continental shelf. This strategy can be used in region one also. The life span of the project could be cut in half since dredging would utilize a higher quality of sediment which would stabilize the tidal prism by building +1 el. areas and to be vegetated. The effect on fisheries would also be shortened.

Another strategy which would help supply sand to nourish the beaches by adding to the amount migrating to the west from the mouth of the river, would be a diversion through the west bank of Southwest Pass into the area of West Delta Blks 52, 53 & 54.
Also, many people in lower Plaq. Parish want to use rock where ever possible to restore some of the structure which controlled the tidal prism. Rock is cheaper but it does not grade well in the 2050 system. Using rock is more acceptable to oyster farmers because it is less detrimental than sediment.
Another item which has been overlooked is the dredging of the Empire to Gulf Waterway. This waterway is supposed to be kept at a nine foot depth. It is filled in and should be dredged. The spoil from the dredging should be used to restore the east bank of the waterway. This would reconstruct an area which has had tremendous effect on the tidal flow from Shell Island to the Buras Boat Harbor.
The above are answers for question # 2.

Question # 1 : The most important issues that have to be addressed are 1) political - inability of elected officials to make critical decisions which have a negative affect on those who are deriving income from areas which have to be restored.
2) The Coast 2050 grading process cannot address areas which have sustained very high loss such as Bastian Bay mapping unit. There is nothing left to save in this area.
3) The COE continues to stress the 2050 stratergies which do not fit into some areas. It seems that we need more flexibility. 2050 is not written in stone.
Question 2 : None

Copy of report: No

List of Issues discussed at the Environmental Briefing (12/11/01)
Louisiana Coastal Area Initiative
With comments January 30,2002
New Orleans District USACE

Issues derived from notes and comments by Mark Davis, Tom Podany and John Lopez from 12/11/01 briefing.

Response comments were based on follow-up discussions with Mark Davis and Tom Podany and are provided to help develop appropriate responses.

*******Indicates those questions that Mark Davis indicated would be especially important to have input from John Saia and Karen Gautreaux***

Consensus Building Issues

******Issue 2** (Mark Davis, Coalition to Restore Coastal Louisiana) The manner and speed with which these studies have been announced and scoped is creating confusion and is outrunning efforts to bolster the state's cornmitment to coastal restoration and public involvement. Indeed, it seems to be frustrating the "one voice, one message" objective that both the state and the ACOE agree must be pursued. Given the importance of broad support, locally and nationally, to implement Coast 2050 it must be recognized that the current approach could actually alienate vital constituencies and undermine ultimate authorization of the program. How will this be addressed and corrected?

Additional comments from Mark Davis: The lead LCA goal is ecological restoration, but closely following are hurricane protection and navigation. We need to be upfront about all three otherwise we will lose support later. The Morganza/Atchafalaya management plans area case in point of mixed goals. with contradictory strategies such as wetland development and creation. *Our message should be that we are trying to sustain Louisiana's coastal heritage i.e. Louisiana's ecosystems, infrastructure and culture The Everglades WRDA authorization* also *has a three-pronged objective of water flow restoration, water supply and agriculture with the emphasis on ecologic restoration.*

Other general comments: Coastal Restoration Team & CSA are creating processes, which will foster consensus between agencies. A Stakeholder Group is incorporated into the LCA management plan.

**** **Issue 4** (Mark Davis, Coalition to Restore Coastal Louisiana) To be successful a broad coalition will be needed to support any attempt at funding. The scoping process over the last few months has already left many constituencies behind. creating confusion and potential disenfranchisement. How will this be addressed and corrected?

Additional comments from Mark Davis: The CWPPRA model for outreach is too passive for the LCA. The LCA outreach program must target those who support it and those who may not. Dr. Orin Pilkey is an outspoken proponent of retreating from coastlines and could be critlcal of the restoration effort. We need to have our own academic spokesman supporting the LCA who will be highly visible.

Other general comments: The briefing meeting held in December and the resulting issues lists are an effort to foster diaiogue and to address the start-up lag with these groups. These efforts will be molded as management and organizational structure is developed, but the effort should not be diminished.

**** **Issue 5** (Mark Davis, Coalition to Restore Coastal Louisiana) The Governor's Committee for the Future of Coastal Louisiana may well recommend the creation of State level Coastal Restoration Advisory Task Force akin to the Governor's Commission for a Sustainable South Florida. Such a vehicle has been described as essential to building consensus and a political base. The process currently being pursued by the Corps does not recognize that need or the fact that an advisory commission could become a reality in a fairly short time The outreach plans described by the study team do not suggest a workable

alternative to such an advisory group. Why is the study team devising its outreach efforts before the Governor's committee can make its recommendations? Also, what plans does the study team have for engaging broader but vital stakeholders given the fact that many of those stakeholders did not get engaged in the Coast 2050 planning process?

Additional general comments from Mark Davis: Completion of framing of the LCA should not occur until after the Governor's Committee for the Coast releases its report.

Other general comments: The LCA management plan envisions as stakeholder group including:

Business and industry
Environmental Orqanizations
Basin/Coastal Stewardship organizations
Parish Governments
Regional Planning Teams
Agriculture interests
Gulf of Mexico Coastal Interests
Landowners

Others may be added as necessary.

******Issue 13** (Steve Cochran, Environmental Defense Fund) Louisiana's environmental initiatives can have a credibility problem when debated on the on the national level. How will the new coastal restoration initiatives be presented nationally to assure they are perceived as accurate and technically sound so that an honest dialogue will develop between the local supporters and national environmental organizations?

Additional comments from Mark Davis: The expertise of people like Jim Tripp and Stew Cochran (EDF) could be very helpful to guide the LCA toward national acceptance and eventual WRDA authorization. Input should also be sought from Fred Caver with the HQUSACE.

Issue 20 (Cyn Sarthou, Gulf Restoration Network) The Louisiana Coastal Area, Louisiana study team is creating a stakeholder group to foster consesus building on coastal restoration projects. Consensus, if reached, will not mean 100% agreement on all Issues. It is essential to include all interested groups/people in this process and avoid the creation of false consensus by favoring certain groups with inclusion or by assuming that one stakeholder representative can adequately represent the diversity of opinion and priorities within a given constituency. How will the study process reflect these facts and address them (including vehicles for discussions of concerns by dissenting parties)?

Additional comments from Mark Davis: The report from the Governor's Committee for the Coast should guide this process.

Issue 21 (Bill Good, Department of Natural Resources)
It will be vitally important to synthesize ideas and information from a broad range of organizations and stakeholders. Constructive dialogue and agreement should be a primary strategy. Will the Louisiana Coastal Area, Louisiana study team consider hiring a professional facilitator to work with the stakeholder group to improve our chance of success?

Additional comments from Mark Davis: A professional facilitator should be used for public meetings whenever there am significant conflicting interests. Public outreach is not about holding meetings, but rather exchange. The Everglades planning (pre-authorization) had a process for dispute resolution.

Authority/ strategic issues

**** **Issue 6** The DMP is the key to large-scale coastal restoration, but requires that the Mississippi River must managed for one additional goal in addition to those two already firmly established by tradition and law. Navigation and flood control has been the basis of river management for over a century. How will a new three-way division of Mississippi River resources be established so that coastal restoration is given appropriate legal basis for effective restoration?

****Issue11** (Mark Davis, Coalition to Restore Coastal Louisiana) The 2050 and DMP components of LCA contemplates significant re-allocation of Mississippi River water through various diversion and navigation channels. Will the 70/30 split of the discharge at the Old River Structure be evaluated under this new initiative of river management?

Additional comments from Mark Davis: This issue should be "left on the table". Input should also be sought from Dr. Len Bahr.

Tom Podany: The 70/30 split can be accessed by an expanded sensitivity analysis that shows the potential for diversions if alternative flow distributions were considered and the prerecon-level impacts, costs, and benefits that miqht be expected from this range of changes. We must make it clear that far more study, modeling, and public participation would be necessary to fully formulate, evaluate, and recommend such a feature (an incredible amount of additional analysis and public participation, in fact). This would address the issue in the way that is manageable.

Issue 12 (Cyn Sarthou, Gulf Restoration Network)The USACE is responsible for protecting wetlands and yet routinely issues permits in Louisiana wetlands. At the same time the USACE has spent $ millions to restore Louisiana wetlands. This failure of stewardship results in part from the USACE delegation of different goals between the permitting branch and the coastal restoration branch of the New Orleans District. Will the Louisiana Coastal area, Louisiana study team recommend a district-level integrated approach so that efforts by different branches will be in harmony and not in conflict with coastal restoration? Similarly, will the programs of neighboring USACE districts be harmonized with our coastal restoration, protection, and stewardship efforts?

Additional comments from Mark Davis: We need to reject permits where they directly conflict with coastal restoration, and where we grant a permit in wetlands we must be prepared to justify it within the context of the coastal restoration.

Other genera/comments: The degree of inconsistency between permitting and restoration is unknown. We should consider mapping Louisiana coastal wetland permitting since CWPPRA (1990) and evaluate the historical overlap with restoration and wetland permitting. Joint discussions should begin with Ron Ventola in COE permitting. An analysis of the role of conservation in achieving a sustainable coast should be parallel in the comprehensive study. The analysis should include the impact of the section 404 program on coastal wetlands, the effectiveness of associated mitigation, and the evaluation of unmitigated losses due to development activities.

**** **Issue 17** (Jim Tripp, Environmental Defense Fund) To successfully fund any restoration initiative requiring such large public investment requires a demonstration that a "new day" has arrived for the coast of Louisiana. Any other activities in the coast should be managed to be beneficial for the coast or at least neutral. How will the Louisiana Coastal Area, Louisiana study team imbue this new coastal management paradigm to governmental agencies and private interests which impact the coast?

Additional comments from Mark Davis: Input should also be sought from Dr. Len Bahr.

Timing issues

Issue 1 (Mark Davis, Coalition to Restore Coastal Louisiana) The Coast 2050 and Delta Management Plan initiatives (DMP must really be part of Coast 2050) are unprecedented in the magnitude of their goals and the short time frame to accomplish it. What are the specific aims of these studies, what is the urgency in pushing the scoping process now?

Additional comments from Mark Davis: Is the LCA goal really WRDA04 or "WRDA ASAP"? Is WRDA06 a more appropriate objective?

Other general comments: Coast 2050 mission statement (draft)
"Develop and implement projects that will preserve and enhance Louisiana's coastal ecosystem so that it continues to support the wetland environment, the economy and the culture of south Louisiana, and

economy and well being of the nation; to be accomplished by long-term partnerships and cooperation among state and federal agencies, stakeholders, environmental organizations, and the public."

The DMP goals are:

1) *Capture Mississippi river sediment before reaching the Gulf of Mexico and use it to build or sustain the coast*
2) *Capture Mississippi river nutrients before reaching the Gulf of Mexico and to benefit coastal wetlands*

Project Management

Issue 7 (Mark Davis, Coalition to Restore Coastal Louisiana) The effort to phase out the MRGO is one example of a significant coastal initiative outside the scope of the Project Study Plan which is in fact a related project. How will initiatives like the MRGO phase out be incorporated into the Project Study Plan?

Additional comments from Mark Davis: Projects like the MRGO Reevaluation Study must be rolled into LCA somehow.

******Issue 8** (Mark Davis, Coalition to Restore Coastal Louisiana) The ultimate cost share between WRDA funding and the state of Louisiana should be a negotiated percentage considering a broad set of factors and comprehensive formulation, and thus should not be predetermined. Will the Louisiana Coastal Area, Louisiana study team keep its options open and avoid a pre-set cost share?

Additional comments from Mark Davis: Many factors might influence the final cost share formula that is finally negotiated in the WRDA legislation. The state should keep its options open to not miss a future opportunity to keep the matching as low as is reasonable.

******Issue 10** (Mark Davis, Coalition to Restore Coastal Louisiana) The geographic boundaries already proposed for the DMP project may be too narrow and project alternatives may have been preemptively excluded already. If pre-project scope definition is ultimately found irreconcilable with final project proposals, the projects are not likely to be funded. How will the Louisiana Coastal Area, Louisiana study team avoid prematurely setting project boundaries that may be detrimental to the project formulation and its funding?

Additional comments from Mark Davis: The DMP should not be restricted to the lower delta and should include the 70/30 split at Old River Control Structure and a Lafourche conveyance canal. Input should also be sought from Dr. Len Bahr.

Technical issues

Issue 9 (Mark Davis, Coalition to Restore Coastal Louisiana) Modern scientific modeling can be important to determine possible project outcomes, but also an effective tool for communicating the project concept to the public or officials. Will scientific models be generated to test project concepts and if so who will generate those models and how will they be integrated into project planning and public involvement?

Additional comments from Mark Davis: Input should also be sought from Falcolm Hull, Troy Constance and Paul Kemp

Issue 14 (Barry Kohl, Louisiana Audubon Council): Previous Federal actions concerning diversions and use of dredged material have not done an adequate job analyzing the potential for contaminated sediments in the project area. What will the Louisiana Coastal Area, Louisiana study team do to ensure that contaminated sediments are properly addressed in the study and Project Study Plan (PSP)?

Additional comments from Mark Davis: consult with Linda Mathies and Barry Kohl to review sediment analysis procedure.

Issue 15 (Doug Daigle, Mississippi River Basin Alliance) There was unnecessary delay in recognition of the linkage between hypoxia and Louisiana's coast wetland loss. Another linkage to coastal restoration is carbon sequestration by increased productivity of wetlands to mitigate global warming. How will the Louisiana Coastal Area, Louisiana study team assure that new issues such as climate change that are relevant to coastal restoration are addressed in a timely and appropriate manner?

Additional comments from Mark Davis: consult with John Ettinger and Doug Daigle to review the importance of this issue to the LCA.

Issue 16 (Jim Tripp, Environmental Defense Fund) How will independent scientific verification and support be developed through organizations like the National Academy of Sciences?

Additional comments from Mark Davis: consult with Sue Hawes, Dr. Len Bahr, Dr. Jenneke Visser and Randy Hanchey. A timetable for reviews should be established now.

Issue 18 (Sam Becker, EPA) It is important to have early involvement by the scientific community. Will the Louisiana Coastal Area, Louisiana study team include a scientific panel at an early stage to review restoration plans and advise the study team?

Additional comments from Mark Davis: consult with Sue Hawes, Dr. Len Bahr Dr. Jenneke Visser and Randy Hanchey.

Issue 19 (John Day, Coast Ecology LSU) Ecosystem management (Ecotechnology) is an emerging field. which may be used to address large-scale systemic environmental issues such as the nutrient enrichment driven dead zone of the Gulf of Mexico. Will the Louisiana Coastal Area, Louisiana study team consider funding for research of nutrient management of the Mississippi River basin by means of wetland ecosystem restoration and riparian forests?

Additional comments from Mark Davis: Input should be sought from John Ettinger, Dr. Paul Kemp and Doug Daigle to review the need for continued research.

Hypoxia issues

Issue 3 (Mark Davis, Coalition to Restore Coastal Louisiana) Hypoxia (dead zone) in the Gulf of Mexico is a national issue that is linked to Louisiana's coastal restoration program. There is a multi-state/federal hypoxia action plan headed by EPA that has its own Task Force that will begin meeting this winter to push the implementatlon of that plan. Many of the national and regional stakeholders that have been identified as necessary participants in the Coast 2050 campaign are already engaged in the hypoxia plan. Restoration and river management plans for coastal Louisiana will directly affect that plan and the work of the Hypoxia Task Force. How are the Hypoxia Action Plan, the Mississippi River/Gulf of Mexico Watershed Nutrient Task Force, and the stakeholder processes developed under the Hypoxia Action plan being recognized, accommodated and integrated into the Coast 2050 and Delta Management studies?

Additional comments from Mark Davis: This is more than a technical planning issue, and also includes consensus building for those who have an interest in the hypoxia problem. Hypoxia should not be the lead issue for the LCA.

USACE- New Orleans District

List of Issues discussed at the Environmental Briefing on the
Louisiana Coastal Area initiative
New Orleans District USACE
December 11, 2001
Derived from notes and comments by Mark Davis -- CRCL and John Lopez - USACE
And reviewed by participants

Consensus Building

Issue 2 (Mark Davis, Coalition to Restore Coastal Louisiana) The manner and speed with which these studies have been announced and scoped is creating confusion and is outrunning efforts to bolster the state's commitment to coastal restoration and public involvement. Indeed. it seems to be frustrating the "one voice, one message" objective that both the state and the ACOE agree must be pursued. Given the importance of broad support, locally and nationally, to implement Coast 2050 it must be recognized that the current approach could actually alienate vital constituencies and undermine ultimate authorization of the program. How will this be addressed and corrected?

Issue 4 (Mark Davis. Coalition to Restore Coastal Louisiana) To be successful, a broad coalition will be needed to support any attempt at funding. The scoping process over the last few months has already left many constituencies behind, creating confusion and potential disenfranchisement. How will this be addressed and corrected?

Issue 5 (Mark Davis, Coalition to Restore Coastal Louisiana) The Governor's Committee for the Future of Coastal Louisiana may well recommend the creation of State level Coastal Restoration Advisory Task Force akin to the Governor's Commission for a Sustainable South Florida. Such a vehicle has been described as essential to building consensus and a political base. The process currently being pursued by the Corps does not recognize that need or the fact that an advisory commission could become a reality in a fairly short time The outreach plans described by the study team do not suggest a workable alternative to such an advisory group. Why is the study team devising its outreach efforts before the Governor's committee can make its recommendations? Also, what plans does the study team have for engaging broader but vital stakeholders given the fact that many of those stakeholders did not get engaged in the Coast 2050 planning process?

Issue 13 (Steve Cochran, Environmental Defense Fund) Louisiana's environmental initiatives can have a credibility problem when debated on the on the national level. How will the new coastal restoration initiatives be presented nationally to assure they are perceived as accurate and technically sound so that an honest dialogue will develop between the local supporters and national environmental organizations?

Issue 20 (Cyn Sarthou, Gulf Restoration Network) The Louisiana Coastal Area, Louisiana study team is creating a stakeholder group to foster consensus buildlng on coastal restoration projects. Consensus, if reached, will not mean 100% agreement on all issues. It is essential to Include all interested groups/people in this process and avoid the creation of false consensus by favonng certain groups with incluslon or by assuming that one stakeholder representative can adequately represent the diversity of opinion and priorities within a given constituency. How will the study process reflect these facts and address them (including vehicles for discussions of concerns by dissenting parties)?

Issue 21 (Bill Good, Department of Natural Resources)
It will be vitally important to synthesize ideas and information from a broad range of organizations and stakeholders. Constructive dialogue and agreement should be a primary strategy. Will the Louisiana Coastal Area, Louisiana study team consider hiring a professional facilitator to work with the stakeholder group to improve our chance of success?

Authority/ strategic issues

Issue 6 The DMP is the key to large-scale coastal restoration, but requires that the Mississippi River must managed for one additional goal in addition to those two already firmly established by tradition and law.

Navigation and flood control has been the basis of river management for over a century. How will a new three-way division of Mississippi River resources be established so that coastal restoration is given appropriate legal basis for effective restoration?

Issue11 (Mark Davis. Coalition to Restore Coastal Louisiana) The 2050 and DMP components of LCA contemplates significant re-allocation of Mississippi River water through various diversion and navigation channels. Will the 70/30 split of the discharge at the Old River Structure be evaluated under this new initiative of river management?

Issue12 (Cyn Sarthou, Gulf Restoration Network) The USACE is responsible for protecting wetlands and yet routinely Issues permits in Louisiana wetlands. At the Same time the USACE has spent $ millions to restore Louisiana wetlands. This failure of stewardship results in part from the USACE delegation of different goals between the permitting branch and the coastal restoration branch of the New Orleans District. Will the Louisiana Coastal Area, Louisiana study team recommend a district-level integrated approach so that efforts by different braches will be in harmony and not in conflict with coastal restoration? Similarly, will the programs of neighboring USACE districts be harmonized with our coastal restoration, protection, and stewardship efforts?

Issue 17(Jim Tripp, Environmental Defense Fund) To successfully fund any restoration initiative requiring such large public investment requires a demonstration that a "new day" has arrived for the coast of Louisiana. Any other activities in the coast should be managed to be beneficial for the coast or at least neutral. How will the Louisiana Coastal Area, Louisiana study team imbue this new coastal management paradigm to governmental agencies and private interests which impact the coast?

Timing issues

Issue1 (Mark Davis, Coalition to Restore Coastal Louisiana) The Coast 2050 and Delta Management Plan initiatives (DMP must really be part of Coast 2050) are unprecedented in the magnitude of their goals and the short timeframe to accomplish it. What are the specific aims of these studies, what is the urgency in pushing the scoping process now?

Project Management

Issue 7 (Mark Davis. Coalition to Restore Coastal Louisiana)The effort to phase out the MRGO is one example of a significant coastal initiative outside the scope of the Project Study Plan which is in fact a related project. How will initiatives like the MRGO phase out be incorporated into the Project Study Plan?

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to the public or officials Will scientific models be generated to test project concepts and if so who will generate those models and how will they be integrated into project planning and public involvement?

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MMS DRAFT IMPACT STATMENTS WHICH ARE NOT [redacted] TAKING INTO ACOUNT COAST 2050 PLAN.

CURRENTLY 2 DRAFT EIS ON GOING

LEASE SALES 2003 - 2007

I am a resident of Region 1 and endorse the following Keystone Strategies:

(a) #15 Maintain East Orleans Land Bridge

(b) #10 Maintain Shoreline Integrity of Locks Pontchartrain

AND

#17 CLOSE MRGO

3 May 2002

Dr. William P. Klein, Jr.
CEMVN – PM – RS
US Army Corps of Engineers
Post Office Box 60267
New Orleans, LA 70160-0267 ***via Internet and US Snail Mail***

Dear Bill:

As you read this communique, I have returned to my desk following several client assignments. Regrettably, I missed the public meeting in Belle Chasse for the --

Louisiana Coastal Area Comprehensive Study,

as announced in *The Times-Picayune* (17 April 2002).

Please add my name to the distribution list for future public meetings. Also, please sent to me any summary report of the study currently available for the public – and bill SMS-USA as appropriate.

As an avid fisherman of the Barataria Basin, I have a keen interest in the long- term restoration of the area – and want to keep properly informed.

As always, I am obliged for your assistance – and wish you continued success with the development of an environmental impact statement.

With best personal regards, I am,

Sincerely yours,

Lee P. Gary, Jr.
Owner

GULF OF MEXICO FISHERY MANAGEMENT COUNCIL

The Commons at Rivergate
3018 U.S. Highway 301 North. Suite 1000 • Tampa. Florida 33619-2266
(813)228-2815• FAX (813) 225-7015
e-mail: gulfcouncil@gulfcouncil.org

May 7,2002

Colonel Thomas F. Julich
District Engineer, New Orleans District
Department of the Army, Corps of Engineers
Post Office Box 60267
New Orleans, Louisiana 70160-0267

Dear Colonel Julich:

The Gulf of Mexico Fishery Management Council's (Council) Habitat Protection Committee (HPC) has reviewed a public notice for scoping comments related to a comprehensive coastwide ecosystem restoration feasibility study in Louisiana. The purpose of the public notice is to gain public input for the programmatic supplemental environmental impact statement (PSEIS). The Council would like to comment on the scope of the coastwide ecosystem restoration study. The Council recognizes the importance of the coastal wetlands and waters that comprise coastal Louisiana and supports any efforts to restore these ecologically valuable areas.

The Council is one of eight regional Fishery Management Councils that were established by the Fishery Conservation and Management Act in 1976 (reauthorized by the Magnuson-Stevens Sustainable Fisheries Act (MSFCMA) of 1996). The Council prepares fishery management plans for fishery resources in the Exclusive Economic Zone (EEZ) of the Gulf of Mexico. While the Council only has jurisdiction in federal waters, Section 305 of the MSFCMA gives the Council the ability to comment on and make recommendations on activities that would adversely affect essential fish habitat (EFH) in state waters.

The public notice requests additional input on the most important issues, resources and impacts that should be considered in the PSEIS and the study process. Since the Council manages several marine fish species that utilize Louisiana's coastal wetlands, the Council feels that the estuarine and marine fishery resources should receive high priority when examining strategies for restoring coastal Louisiana. Coastal Louisiana contains a diversity of habitats that the Council has identified as EFH for several species that the Council manages. Detailed information on this EFH designation can be located in the 1998 Generic Amendment for Addressing Essential Fish Habitat Requirements in the Council's Fishery Management Plans. This habitat also supports many economically important marine fish species that serve as important members of the marine ecosystem and as prey for other additional species that the Council manages. The wetlands in this area also produce nutrients and detritus that contribute to fishery productivity in the surrounding inshore and offshore areas.

The public notice also requests additional strategies or modifications to existing Coast 2050 strategies that should be considered in the PSEIS and the study process. All of the regional ecosystem strategies recognize the importance of restoring natural drainage patterns. The Council recognizes the ecological importance of freshwater inflow to maintenance of the estuaries and the role of estuaries in maintaining healthy fishery resources. The Council has a keen interest in maintaining adequate freshwater inflow to estuaries, and therefore applauds efforts to restore natural drainage patterns. With this being said, the Council is concerned about Region 3, Ecosystem Strategy 10, which calls for preventing adverse tidal exchange between Gulf/lake, lake/marsh, bay/marsh, Gulf/bay, and marsh/navigation channel locations. The Councii would like to caution against overzealous tidal exchange control at the expense of ingress/egress of estuarine-dependent species.

The Council strongly supports Region 3, Regional Programmatic Strategy 6, which calls for a statewide plan for management of surface and ground water supplies. The only concern the Council has is that this strategy is a statewide plan, but is not considered a coastwide common strategy. The Council feels that a statewide plan for management of surface and ground water supplies is one of the most important things the state can do in terms of overall water management for the future and feels that this strategy should be a coastwide goal and not just a goal for Region 3.

The Council is also concerned about Region 4, Regional Programmatic Recommendation 4, which calls for allowing "limited estuarine organism access". While the Council is not sure of the exact context in which this recommendation was made. the Council would recommend that estuarine organism access be maximized to the extent possible in conjunction with the other programmatic goals addressed in the plan.

The Council appreciates the opportunity to provide comments on the scoping of this PSEIS. We hope that our recommendations can improve the study. If you have my questions or concerns, please do not hesitate to contact the Council.

Sincerely,

Roy Williams
Council Chairman

RW: JR:plk

c: Gulf Council
Staff

H:\A\HABITAT\ScopingComments4-02.doc

May 7,2002

Dr. William Klein
Mr. Troy Constance
CEMVN-PM-RS/W
P.O. Box 60267
New Orleans, La 70160-0267

To Whom It May Concern,

I am submitting the following comments relative to the Programmatic Supplemental EIS for the Comprehensive Coastwide Ecosystem Restoration Feasibility Study on behalf of the Mississippi River Basin Alliance (MRBA.) MRBA is a non-profit organization with over 150 member groups along the entire length of the river, dedicated to the protection and restoration of the health of the river system and the communities that depend on it. A critical part of that vision is the restoration of Louisiana's coast and the active river delta to a sustainable condition. We welcome the opportunity to submit comments on the LouisianaCoastal Area Comprehensive Study of the Coast 2050 Restoration Plan.

I. Reconciling restoration efforts with other concerns

The Public Notice on the Programmatic Supplemental EIS Scoping Meetings issued by the Corps of Engineers states that "The LCA Comprehensive Study will evaluate the restoration strategies identified in the Coast 2050 Plan... developing those strategies, and selecting plans that best address the ecosystem restoration necds for the entire Louisiana coastal area, while complying with applicable rules, regulations, and administration policy." We see a serious need for the wetlands restoration work being carried out by the Corps and other federal and state agencies to be reconciled with the permitting process. In the New Orleans District, pemits are issued on a wide scale for wetlands development in the Pontchartrain, Calcasieu, anti other basins across the southern and coastal region of the state.

Observers from other regions have questioned how the state can allow widespread wetlands development while also seeking major federal funding for wetlands restoration. Members ofthe public in Louisiana have expressed concern that development is being allowed in areas directly at risk or projected to have increased vulnerability to hurricanes from wetland loss. Pending development projects on Grand Isle are one example of this inconsistency. The Regional Programmatic Recommendations for Region 1, site of some

of the most intense development of wetlands, call for reducing "the draining and development of marshes." Swamps should be included in this recommendation as well. Conservation and protection of forested wetlands in the coastal zone is also an important consideration.

On another note, Louisiana's unfortunate legacy of shortsighted environmental policies has resulted in the contamination of sediments in many water bodies and wetland areas across the state. The Coastwide Common Strategies for the Coast 2050 Plan include "beneficial use of dredged material from maintenance operations to create, restore, or protect wetlands," and "dedicated dredging to create, restore, or protect wetlands."

Members of the public have expressed concerns about contaminants being liberated and dispersed into waterways, wetlands, and estuaries through dredging operations. It is vital that agencies conduct adequate testing prior to dredging, especially in areas such as the Calcasieu Basin which have a history of toxic contamination, as an integral part of restoration projects, and that the public be adequately informed of this policy.

II. Multiple Benefits

It is also important that coastal restoration efforts be coordinated with other ecosystem restoration and protection efforts. Restoration projects can have a significant impact on reducing the spread of hypoxia in Louisiana's offshore waters. At the same time, members of the public have expressed concerns about nutrient-laden waters from the Mississippi River being redirected into wetland areas. The incorporation of nutrient studies into the plan for the Maurcpas Swamp Diversion is an encouraging sign, as are the ongoing studies documenting nutrient uptake in the marshes receiving river water from the Caernarvon Diversion. Nutrient uptake study should be an integral part of the planning for restoration projects. As noted above, it is important that the public be kept informed of these policies so that concerns about water quality can be allayed.

The active delta and Louisiana's coast and southern region are areas likely to be significantly affected by climate change. Planning for the restoration effort should incorporate the most up to date projections for sea-level rise. A recent report issued by the Union of Concerned Scientists and the Ecological Society of America estimated that Louisiana's coast could see relative sea-level rise of 44 inches over the next century in areas with the greatest subsidence.[1] At the same time, freshwater diversion and other projects that build coastal marshes and lay down river-borne sediments have the potential for significant carbon burial and sequestration. The Mississippi River delta plays an important role in the carbon "budget" of North America Monitoring and research on this issue should be incorporated into the Coast 2050 Plan, since carbon sequestration from restoration projects could contribute to balancing the carbon budget of Louisiana and the region.

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[1] ***Confronting CIimate Change in the Gulf Coast Region: Prospects for Sustaining Our Ecological Heritage "***, Dr. Robert Twilley, et.al. UCS/ESA 2001.

MRBA Comments - 3

III. Specific Regional Suggestions

Among the many recommendations and strategies identified across the 4 coastal regions, we would like to call attention to several in particular.

Region 1

Pearl River -We support the recommendation to restrict West Pearl River dredging. We have expressed in writing our concerns about dredging at the mouth of the Pearl and dispersal of mercury-contaminated sediments.
NERR -While the location is still to be determined, we strongly support the establishment of a National Estuarine Research Reserve in Louisiana
Joyce and Manchac WMAs - We support the expansion of these Wildlife Management Areas.

Region 2

Bayou Lafourche -We support the Bayou Lafourche Siphon and Pump Project as a vital way to restore sustainable river flow to an important estuary.
Alternative sources of sediment - The potential for using compost as part of restoration, in particular from yard waste generated by large municipal areas, should be explored across the coast. In many locations, there may be opportunities for combining municipal yard waste with dredge spoil to create a natural resource material that could contribute to the replenishment of marshes and benefit municipalities by reducing landfill costs.

In conclusion, we urge that the state and its federal partners continue the important work of bringing to Louisiana a perspective of responsible stewardship of the natural systems and resources of our coast and the Mississippi River delta. While significant progress has been made, much remains to be done to convey the message that the state's coastal crisis has shown us that business as usual in the treatment of our forests, waters, and wetlands is no longer acceptable. The restoration effort and the state as a whole can only benefit from this change.

Sincerely,

Doug Daigle
Hypoxia Program Director

May 7,2002

Colonel F. Thomas Julich
District Engineer N.O. District
U.S. Army Corps of Engineers
Post Office Box 60267
New Orleans, LA 70160

Dear Colonel Julich,

This will serve as an official comment in regard to the Public Notice in conjunction with the Programmatic Supplemental EIS Scoping Process for the Louisiana Coastal Area LA-Comprehensive Coastwide Ecosystem Restoration Feasibility Study.

Comments presented herein are in relation to Point au Ferisland located within Region 3. Several CWPPRA projects have been implemented on the Island and ample opportunity exist to expand on strategies contained in the Coast 2050 Plan.

Of particular importance would be a project to protect the front side of the island from continuous erosion by the Gulf of Mexico. Foreshore protection barriers such as those in place at Raccoon island would provide protection to the fragile beachfront and extend the life of the CWPPRA projects installed on this important barrier island.

In addition to shoreline protect, expanded hydrologic restoration and dedicated dredge and fill activity such as that accomplished by the CWPPRA project, Hydrologic Restoration of Lake Chapeau, should be implemented. Because of the size of Point au Fer Island and its strategic location south of the fragile floating marshland in southwest Terrebonne Parish, restoration and protection projects can be expected to extend well into the future and assure excellent function and values of this section of coastal wetlands.

Many of the Coastwide Common Strategies and Region 3 ecological strategies apply to existing conditions at Point au Fer Island and should be implemented as soon as possible. Of particular importance to the Island will be the judicious use of silt and freshwater available from the Atchafalaya River. Efforts should be made within the Coast 2050 Plan to accelerate the movement of silt into the eastern end of Atchafalaya Bay as a product of the Corps of Engineers navigation channel maintenance program.

Wetlands and Wildlife Management Co. • 246 Allan Ensminger Rd. • DeRidder, LA 70634

I appreciate the opportunity as a wetland manager to participate in the development of long-range projects to protect some of our existing ecosystems and prolong their productivity.

Sincerely yours,

Allan B. Ensminger

ABE/me
c.c. Mr. Charles I. Denechaud III

May 7,2002

Colonel F. Thomas Julich
District-Engineer
U.S. Army Corps of Engineers
New Orleans District
Post Office Box 60267
New Orleans, LA 70160

Dear Colonel Julich,

This will serve as an official comment in regard to the public Notice in conjunction with the Programmatic Supplemental EIS Scoping Process for the Louisiana Coastal Area, LA-Comprehensive Coastwide Ecosystem Restoration Feasibility Study.

Comments presented herein are in relation to the LaBranche Wetland ecosystem located between the west boundary of Jefferson Parish and the Bonnet Carre Spillway and on the east bank of St. Charles Parish This large ecosystem contains approximately 20, 000 acres of Cypress-Tupelo Swamp and bottomland hardwood forest, Following the construction of the Mississippi River Gulf Outlet, saltwater intrusion through the Inter-harbor Canal brought about a drastic change in the daily water salinity value of the lake and has resulted in a drastic change in plant communities of the heretofore-freshwater marsh and swamp ecosystem. Until a barrier is installed in the Inter-harbor Canal water salinity will remain above the tolerancerange of freshwater plant communities. Drought conditions experienced in 2000 compounded the situation and demonstrated that without a closure of the shoreline of Lake Pontchartrain in the above described area and a saltwater barrier at the mouth of Bayou LaBranche the entire ecosystem will continue to deteriorate and become another skeleton forest, so common along our coast.

Many sections of coastal Louisiana are faced with complex geographic and hydrologic landscape issues that limit the strategies available for protecting or restoring the deteriorated coastal area This is not the situation with regard to the La Branche Wetlands. The first CWPPRA project, installed on the St. Charles Land Syndicate property, demonstrated the feasibility of dredge and fill to create wetlands in critical areas. Additional restoration sites along the shoreline of Lake Pontchartrain exist and should be given top priority in the CWPPRA process.

Wetlands and Wildlife Management Co. ● 246 Allan Ensminger Rd. ● DeRidder, LA 70634

Diversion of Mississippi River water into the La Branche Wetlands would be difficult due to the developcd area along the natural levee system of the river. An additional obstacle for meaningful freshwater introduction is the newly constructed St. Charles Hurricane Protection Levee. Freshwater introduction would necessarily have to be beyond this barrier to be acceptable to residents of the area Utilization of the existing Bonnet Carre Spillway Reservation should be an annual event by the Corps of Engineers in spite of the objections of misguided environmentalist that want the lake to be a pristine area instead of a receiving area for coastal restoration downstream.

I appreciate the opportunity as a wetland manager to participate in the development of long-range projects to protect some of our existing ecosystems and prolong their productivity.

Sincerely yours,

Allan B. Ensminger

Allan B. Ensminger

ABE/me
c.c. Mr. W. A. Monteleone. Jr.

CONTINENTAL LAND & FUR Co., INC.

909 POYDRAS STREET, SUITE 2100

NEW ORLEANS, LOUISIANA 70112-1051

TELEPHONE 504 / 586-1718 TELECOPIER 504 / 581-4398

May 8,2002

VIA FAX

U.S. Army Corps of Engineers
New Orleans District
P.O. Box 60267
New Orleans, LA 70160-0267

Attention: Dr. William P. Klein. Jr.
LCA PSEIS
CEMVN-PM-RS

Re: LCA Comprehensive Study

Gentlemen:

Continental Land & Fur Co., Inc. (CL&F) owns property in the upper Penchant sub-basin of the Terrebonne basin, all of which is located in Townships 17 and 18 South. Ranges 12, 13, 14 and 15 East, Terrebonne Parish, Louisiana. CL&F has owned and managed its property for over 70 years, the vast majority of which is classified as a freshwater flotant marsh. CL&F's property falls within Coast 2050 Region 3, therefore. CL&F respectfully requests that the following comments be incorporated in the Programmatic Supplemental Environmental Impact Statement:

- **Different marsh types need different approaches** - Coastal restoration and regulatory agencies need to realize that the different marsh types in coastal Louisiana require different management approaches. For example, CL&F's flotant marshes consist of thin and thick mats of interwoven roots binding decaying plant detritus into a platform that floats on the water. The peats and organic deposits underlying the flotant marshes are literally held in place by the natural ridges surrounding them. Flotant marshes are remarkably resilient as long as these natural ridges remain unbreached. Once breached, however, the movement of water through the gaps creates a pumping effect which rapidly removes the fluid and poorly consolidated material underlying the flotant marsh. The numerous oil and gas canal banks on CL&F's property perform the Same functions as a natural ridge in the flotant marshes. Currently, the agencies do not allow oil and gas operators to place the organic material recovered in maintenance dredging operations on the canal spoilbanks to protect the flotant marshes, even though the material quickly vegetates and subsides back to nearly marsh level in a very short time frame.

- **Beneficial use of dredged material** - This concept has been embraced in most of the restoration plans to date and is a Coast 2050 Coastwide Common Strategy. Unfortunately, the regulatory agencies encourage oil and gas companies operating in South Louisiana to prop or wheel wash, thereby destroying the dredged material instead of placing the material on the adjacent spoilbanks. When dredged material is placed on the spoilbanks at our request, the agencies require mitigation due to the impact to the old spoilbanks.

- **Navigational channels** - The stabilization of the width of major navigational channels is also a Coast 2050 Coastwide Common Strategy. The Gulf Intracoastal Waterway (GIWW), Avoca Island Cut-off Channel and the Bayous Boeuf, Chene, and Black project have eroded many times beyond the contractual right of way width. To the best of our knowledge, the Corps of Engineers has never maintained the banks of these navigational channels. Since these channels are beyond the original width provided for in the right of way agreements, the Corps of Engineers should compensate the affected landowners. CWPPRA Project TE-43 has been approved for bank stabilization along the GIWW in Terrebonne Parish. This project should be given high priority as it will bring much needed protection to an area that has suffered severe erosion due to non-maintenance of the GIWW banks.

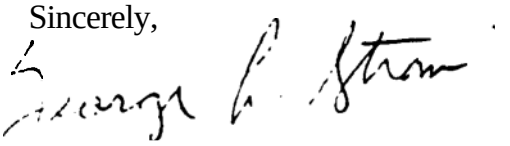
CL&F Coast 2050 Region 3-Regional Ecosystem Strategies Proposals/Revisions

- Revise strategy 6 to provide for the bank stabilization of navigation channels will also be for the protection of adjacent wetlands.
- Revise strategy 7 to provide that before more Atchafalaya water is directed through the GIWW, the banks need to be stabilized.
- Revise strategy 11 to provide that oil and gas canal banks in a flotant marsh should be maintained.
- Bayou Penchant/Lake Penchant watershed CWPPRA project. This project is designed to manage the sediment and hydrologic flow in the Penchant basin. A goal of the project is to relieve flooding in the northern end of the basin by sending Atchafalaya river water to the southern end through additional outlets. Implementation of this project should be given high priority.
- Wave limit controls should be instituted on the GIWW, Avoca island Cut-off Channel and the Bayous Chene, Boeuf, and Black navigation project in an effort to reduce the impact of the boat wakes on the adjoining marshes.
- Lake Verret Pump Project - The upper Penchant marshes are experiencing flooding conditions. Consider moving the pumps to move water to the east where saltwater intrusion is a problem rather than transferring it to an area where excessive water is already a problem.

- Maintain oil and gas canal banks by placing the dredged material from maintenance operations in a fresh flotant marsh environment on adjacent spoilbanks to protect the fragile flotant marshes.
- Reevaluate the Mississippi (70%)/Atchafalaya (30%) allocation at the Old River Control Structure. By reducing the flow of the Mississippi down the Atchafalaya, flooding problems in Morgan City, the Lake Verret basin and the flotant marshes in the Penchant basin would be alleviated. By changing the allocation, more river water would be available for the proposed river diversions dong the Mississippi River.
- Implementation of CWPPRA Project TE-43 should be given high priority.
- The Corps of Engineers should be required to stabilize the banks of the GIWW, Avoca Island Cut-off Channel and the Bayous Boeuf, Chene and Black project with the dredged material received during annual dredging operations and rip rap. The maintenance of these channels should begin now and not wait for the year 2050.

Thank you for the opportunity to allow CL&F to submit comments to be included in the PSEIS. If you should have any questions or require additional information, please do not hesitate to contact the undersigned.

Sincerely,



George A. Strain
Vice President

GAS/nkv

cc: Herman Crawford
Troy Constance, CEMVN-PM-W

Fax Transmission

CONTINENTAL LAND & FUR CO., INC.
909 Poydras Street, Suite 2100
New Orleans, Louisiana 70112-1051
Telephone 504/586-1718 Telecopier 504/581-4398

To: Mr. Troy Constance PM IV

Company: U.S. Army Corps of Engineers

Fax No.: 504-862 - 2572

From: George A. Strain

Date: May 08 2002

Re: LCA Comprehensive Study

Number of Pages: 2
(including cover sheet)

MESSAGE:

Please replace page 1 of previous faxed version with the attached.

ORIGINAL DOCUMENT WILL BE MAILED WILL NOT BE MAILED

If you do not receive the complete message, please call (504) 586-1718

CONTINENTAL LAND & FUR CO., INC.

909 POYDRAS STREET, SUITE 2100

NEW ORLEANS, LOUISIANA 70112-1051

TELEPHONE 504 / 586-1718 TELECOPIER 504 / 581-4398

May 8,2002

VIA FAX

U.S. Army Corps of Engineers
New Orleans District
P.O. Box 60267
New Orleans, LA 70160-0267

Attention: **Mr.Troy Constance**
Study Manager
CEMVN-PM-W

Re: LCA Comprehensive Study

Gentlemen:

Continental Land & Fur Co., lnc. (CL&F) owns property in the upper Penchant sub-basin of the Terrebonne basin, all of which is located in Townships 17 and 18 South, Ranges 12,13,14 and 15 East Terrebonne Parish. Louisiana CL&F has owned and managed its property for over 70 years, the vast majority of which is classified as a freshwater flotant marsh. CL&F's property falls within Coast 2050 Region 3, therefore, CL&F respectfully requests that the following comments be incorporated in the Programmatic Supplemental Environmental Impact Statement:

- Different marsh types need different approaches - Coastal restoration and regulatory agencies need to realize that the different marsh types in coastal Louisiana require different management approaches. For example, CL&F's flotant marshes consist of thin and thick mats of interwoven knots binding decaying plant detritus into a platform that floats on the water. The peats and organic deposits underlying the flotant marshes are literally held in place by the natural ridges surrounding them. Flotant marshes are remarkably resilient as long as these natural ridges remain unbreached. Once breached, however, the movement of water through the gaps creates a pumping effect which rapidly removes the fluid and poorly consolidated material underlying the flotant marsh. The numerous oil and gas canal banks on CL&F's property perform the same functions as a natural ridge in the flotant marshes. Currently, the agencies do not allow oil and gas operators to place the organic material recovered in maintenance dredging operations on the canal spoilbanks to protect the flotant marshes, even though the material quickly vegetates and subsides back to nearly marsh level in a very short time frame.

Restore or Retreat

May 8,2002

U.S. Army Corps of Engineers
New Orleans District
Attn: Dr. William P. Klein. Jr.
P.O. Box 60267
New Orleans, LA 70160-0267

Re: Louisiana Coastal Area Comprehensive Coastwide Ecosystem Restoration Feasibility Study
Programmatic Supplemental EIS Scoping Comments

Dear Dr. Klein:

Restore or Retreat. Inc. (ROR) is a newly formed nonprofit organization consisting of concerned citizens throughout Louisiana and the United States. The members of ROR support large-scale restoration strategies that will benefit the Barataria and Terrebonne basins in southeast Louisiana, which are losing land at the highest rates as depicted in the following excerpt:

> *Excerpt from MRSNFR, USCOE 2000:*
>
> *The portions of the Barataria and Terrebonne Basins on either side of lower Bayou Lafourche have experienced some of the highest wetland loss rates in the United States. Between the 1930s and 1990, 37 percent of the marshes in lower Terrebonne were lost, and at the same time 44 percent of lower Barataria marshes became open water. Even with CWPPRA projects and freshwater diversions, by the year 2050, 40 percent of today's marshes in the Barataria Basin are anticipated to be gone. In Terrebonne, over 50 percent of the marshes there today could well have been lost.*

ROR hereby submits a response to the Programmatic Supplemental EIS for the Louisiana Coastal Area (LCA) Comprehensive Coastwide Ecosystem Restoration Feasibility Study. In accordance with the Public Notice, ROR is providing a response to the two questions posed.

Question 1:
What are the most important issues, resources, and impacts that we should consider in the PSEIS and the study process?

The most critical issue is the fact that Louisiana is losing land at astronomical rates and if we continue to delay implementation of major projects, entire coastal communities will be forced to retreat and Louisiana will experience an environmentall, economic and

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cultural disaster. The Baratana and Terrebonne basins are losing land at the highest rates in the state at 10 to 11 square miles per year. For this reason, the necessary resources should be allocated to this area of the state in order to expedite large-scale restoration projects.

The significant issues related to Louisiana's coastal restoration effort are simultaneously restoring the estuarine system, while also building land and providing flood protection. The Mississippi River built this estuarine system, and it is the area's most valuable resource for effectively restoring coastal Louisiana.

Throughout the restoration process, the state and federal regulatory agencies must involve the public and the stakeholders so that the impacts to the citizens and communities can continuously be considered. Specific impacts that must be considered include: flood protection, nutrient levels and contaminants in the Mississippi River water, oyster industry, commercial and recreational fisheries, and Mississippi River water levels.

Question 2:
Are there any other COAST 2050 coastwide or regional strategies or modifications to existing COAST 2050 coastwide or regional strategies that we should consider in the PSEIS and the study process?

The Third Delta Conveyance Channel (herein referred to as Conveyance Channel) is a COAST 2050 strategy and it was recommended as a regional strategy in both Region 2 (Barataria Basin and Region 3 (Terrebonne Basin). In addition, the Conveyance Channel was included in the COAST 2050 Reconnaissance Study, also known as the 905(b) report, wherein the report cites:

> "The plan presented here calls for significant changes in existing management of the lower Mississippi River, to greatly increase sediment and freshwater input into coastal estuaries and restart the natural processes of land building and maintenance. Specifically, the plan and resulting outputs include: ....(5) construction of a conveyance channel parallel to Bayou Lafourche to build deltas in adjacent waters." (USCOE 905(b) Report. May 7, 1999)

The Conveyance Channel was also discussed in the Mississippi River Sediment, Nutrient and Freshwater Redistribution Feasibility Study (MRSNFR)(USACE 2000) in Section 7.5, Bayou Lafourche Conveyance Channel. According to MRSNFR, the Conveyance Channel was included in the preliminary array of the MRSNFR study; however, it was eliminated from further analysis at the first level of screening based on two considerations. First, because it was believed that ongoing investigation of the Bayou Lafourche Siphon project would provide insight to the needs and viability of the project. And second, MRSNFR was based on opportunistic strategies, not "need based" strategies and the Conveyance Channel is considered a "need based" project. The report also states:

> "The alternative docs, however, have merit as a need based project. There are a limited number of means to direct Mississippi River sediments, nutrients and flows to the Terrebonne region of coastal Louisiana. This alternative would address that regions needs. In addition, this alternative could address the issue of long-term coastal restoration planning. The potential for benefits extends beyond the normal planning project life with the magnitude of this alternative. For these

> reasons this alternative has also been included as a regional strategy in the COAST 2050 plan." (MRSNFR, USACE, 2000)

In addition, Section 8.4.3 of the MRSNFR study states:

> "It was also indicated that this alternative (referring to the Conveyance Channel) is possibly the most effective available for using riverine resources to addressing the specific needs of the Terrebonne basin. The currently authorized Louisiana Coastal Area, Ecosystem Restoration feasibility study provides a forum for the consideration of comprehensive measures specific to various coastal basins. It is therefore recommended that this alternative be carried over to that study effort." (MRSNFR, USACE 2000).

Coastal Environments, Inc. conducted a preliminary conceptual plan of the Conveyance Channel under contract with the US EPA in June 1999. This plan establishes the framework for the conceived strategy and should be used to develop an in-depth analysis.

In conclusion, a detailed anaiysis of the Conveyance Channel strategy was not included in the MRSNFR study, or as part of the Bayou Lafourche Siphon Project, or as a separate reconnaissance level study. Therefore. the members of ROR support further analysis of the Conveyance Channel strategy as a major restoration project for Region 2 and Region 3 as part of the PSEIS and the LCA study process.

In conjunction with the Conveyance Channel, ROR supports near term strategies that could prevent furthcr intrusion of the Gulf of Mexico while the Conveyance Channel is built and implemented. These other near term strategies include strategic pipeline sediment diversions, land bridge restoration and barrier island restoration.

Thank you for your consideration of these comments. If you have any questions or we can be of further assistance, please contact our office at 985/448-4485.

Sincerely,
RESTORE OR RETREAT, INC.

Lon LeBlanc
Executive Director

cc: Governor M.J. Foster, Jr.
Mr. Jack Caldwell, LA Department of Natural Resources
Mr. Randy Hanchey, LA Department of Natural Resources
Mr. Len Bahr, Governor's Office of Coastal Activities
ROR Executive Committee

Restore or Retreat

DATE: 5/22/02

ATTENTION: Troy Constance

COMPANY: COE

FAX NUMBER: 504-862-2572

FROM: Lori LeBlanc Szczecina, Executive Director

TOTAL PAGES: 4 **(Including Cover)**

MESSAGE:

Troy - Here is a copy of ROR's written response to the EIS Scoping Process - if you don't already have a copy.

Lori

P.O. BOX 2048-NSU • Thibodaux, Louisiana 70310 • (985) 448-4485 • FAX (985) 448-4486

Restore or Retreat

May 8,2002

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New Orleans District
Attn: Dr. William P. Klein, Jr.
P.O. Box 60267
New Orleans, LA 70160-0267

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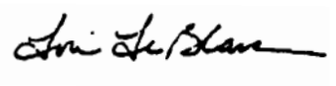
Sincerely,
RESTORE OR RETREAT, INC.



Lori LeBlanc
Executive Director

cc: Governor MJ. Foster, Jr.
Mr. Jack Caldwell, LA Department of Natural Resources
Mr. Randy Hanchey, LA Department of Natural Resources
Mr. Len Bahr, Governor's Office of Coastal Activities
ROR Executive Committee

United States Department of the Interior

FISH AND WILDLIFE SERVICE
646 Cajundome Blvd.
Suite 400
Lafayette, Louisiana 70506

May 9,2002

Dr. William P. KIein, Jr.
CEMVN-PM-RS
U.S. Army Corps of Engineers
Post Office Box 60267
New Orleans, Louisiana 70160-0267

Dear Dr. Klein:

The U.S. Fish and Wildlife Service has reviewed the April 4, 2002, Notice of Intent (NOI) to prepare a Programmatic Supplemental Environmental Impact Statement (PESIS) for the Louisiana Coastal Area, Louisiana - Comprehensive Coastwide Ecosystem Restoration Feasibility Study (LCA Comprehensive Study). That study will identify projects that would sustain a coastal ecosystem that supports and protects the environment, economy and culture of southern Louisiana, and contributes to the Nation's well-being. The Service submits the following scoping comments in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401. as amended: I6 U.S.C. 66 I et seq.), the National Environmental Policy Act of 1969 (83 Stat. 852, as amended; 42 U.S.C. 4321 et seq.), and the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.).

AS you know, the U.S. Fish and Wildlife Service is playing a significant role in the LCA Comprehensive Study. The Service and the U.S. Geological Survey are participating on the Coast 2050 Co-location Team. Furthermore, Service personnel are serving on the Framework Development Team and the Regional Project Development Teams for that study. We plan to cooperate closely with the Corps of Engineers and the other involved agencies in the preparation of the PSEIS, and in the formulation of the plan ultimately recommended in the study report.

Significant fish and wildlife resources that should be addressed in the PSEIS include migratory birds (including migratory and resident waterfowl, shorebirds, wading birds, songbirds, and raptors), threatened and endangered species and their designated critical habitat, estuarine-dependant fishes and shellfishes, anadromous fishes, and important habitats such as emergent marsh, submerged aquatic vegetation, swamps, natural levee forests, other forested habitats, barrier islands, cheniers. and shallow open water. Coastal Louisiana contains 10 National Wildlife Refuges encompassing over 300,000 acres; the impacts (both positive and negative) of alternatives addressed in the PSEIS on those areas must be carefully considered in that document and as part of the associated plan formulation and evaluation phases of the study.

We will continue to work closely with your staff during this feasibility study and the associated PSEIS preparation. The Service will also prepare a Fish and Wildlife Coordination Act on the recommended plan. We will also provide a current list of Federally listed threatened and endangered species found in the study area, and information on their critical habitat. If you have any questions regarding our comments, please contact Catherine Grouchy at 337/291-3104 or 504/862-2689.

Sincerely,

David W. Frugé
Supervisor
Louisiana Field Office

cc: EPA, Dallas, TX
NMFS, Baton Rouge, LA
LA Dept. of Wildlife and Fisheries, Baton Rouge, LA
LA Dept. of Natural Resources (CRD), Baton Rouge, LA
FWS, Washington, DC (BFA/ERT)
FWS, Atlanta, GA (AES)
FWS, Ocean Springs, MS
OEPC, Washington, DC